## In The Matter Of:

COMMODORE BANK v. GEORGE MICHAEL RILEY, SR.

GEORGE MICHAEL RILEY, SR.
November 4, 2013

NEARY REPORTING SERVICES, LLC
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1	UNITED STATES BANKRUPTCY COURT		1	APPEARANCES
2	SOUTHERN DISTRICT OF OHIO		2	On behalf of the Plaintiff:
3	EASTERN DIVISION		3	Gary E. Becker, Esq. Dinsmore & Shohl
4	* * *		4	255 East Fifth Street 1900 Chemed Center
5	In Re:		5	Cincinnati, Ohio 45202
6	GEORGE MICHAEL RILEY, SR.		6	
7	* * *		7	
8	COMMODORE BANK		8	On behalf of the Defendant:
9	Plaintiff,		9	Michael T. Gunner, Esq. 3535 Fishinger Boulevard
LO	vs. CASE NO. 12-60636		10	Suite 220 Hilliard, Ohio 43026
.1	ADVERSARIAL PROCEED	ING NO:	11	
.2	13-ap-02094		1.2	ALSO PRESENT: Jeff Danford
.3	GEORGE MICHAEL RILEY, SR.,		13	
.4	Defendant.		14	* * *
.5	* * *		15	
6	Deposition of GEORGE MICHAEL RI		16	
.7	SR., Defendant herein, called by the Pla	intiff	17	
8.	for examination pursuant to the Rules of	Civil	18	
.9	Procedure, taken before me, Melissa A. N	leary, a	19	
0	Notary Public and Professional Reporter	in and	20	
1	for the State of Ohio, at the offices of		21	
2	Dinsmore & Shohl, 191 West Nationwide		22	
23	Boulevard, Columbus, Ohio, on Monday, No	vember	23	
4	4, 2013, at 1:51 p.m.		24	
25	* * *		25	
		Page 2		Page
1	INDEX		,	GEORGE MICHAEL RILEY, SR.,
2		PAGE	1	of lawful age, Defendant herein, having been
3			3	first duly cautioned and sworn, as hereinafter
4	BY MR. BECKER:	4	4	certified, was examined and said as follows:
5			5	EXAMINATION
6	EXHIBITS			BY MR. BECKER:
7	Plaintiff's Exhibit Number 12	7	7	Q. Good afternoon, Mr. Riley. We've met
	Plaintiff's Exhibit Number 13	8		
8	PIAINCILL & EXHIBIT NAMEDEL TO	8		before. My name is Gary Becker. We are here
8 9	Plaintiff's Exhibit Number 14	12	8	before. My name is Gary Becker. We are here today pursuant to a Notice to take your
9			8	today pursuant to a Notice to take your
9 10	Plaintiff's Exhibit Number 14	12	8 9 10	today pursuant to a Notice to take your deposition in the adversarial proceeding that's
9 10 11	Plaintiff's Exhibit Number 14 Plaintiff's Exhibit Number 15	12 14	8	today pursuant to a Notice to take your
9 10 11	Plaintiff's Exhibit Number 14 Plaintiff's Exhibit Number 15 Plaintiff's Exhibit Number 16	12 14 15	8 9 10 11	today pursuant to a Notice to take your deposition in the adversarial proceeding that's pending in federal bankruptcy court, Case
9 L0 L1 L2 L3	Plaintiff's Exhibit Number 14 Plaintiff's Exhibit Number 15 Plaintiff's Exhibit Number 16 Plaintiff's Exhibit Number 17	12 14 15 17	8 9 10 11 12	today pursuant to a Notice to take your deposition in the adversarial proceeding that's pending in federal bankruptcy court, Case 13-02094.
9 L0 L1 L2 L3	Plaintiff's Exhibit Number 14 Plaintiff's Exhibit Number 15 Plaintiff's Exhibit Number 16 Plaintiff's Exhibit Number 17 Plaintiff's Exhibit Number 18	12 14 15 17	8 9 10 11 12 13	today pursuant to a Notice to take your deposition in the adversarial proceeding that's pending in federal bankruptcy court, Case 13-02094.  The last time that we were here in
9 L0 L1 L2 L3 L4	Plaintiff's Exhibit Number 14 Plaintiff's Exhibit Number 15 Plaintiff's Exhibit Number 16 Plaintiff's Exhibit Number 17 Plaintiff's Exhibit Number 18 Plaintiff's Exhibit Number 19	12 14 15 17 57	8 9 10 11 12 13	today pursuant to a Notice to take your deposition in the adversarial proceeding that's pending in federal bankruptcy court, Case 13-02094.  The last time that we were here in this office taking a deposition, you were designated by Ohio Rock to be the spokesperson
9 L0 L1 L2 L3 L4 L5	Plaintiff's Exhibit Number 14 Plaintiff's Exhibit Number 15 Plaintiff's Exhibit Number 16 Plaintiff's Exhibit Number 17 Plaintiff's Exhibit Number 18 Plaintiff's Exhibit Number 19 Plaintiff's Exhibit Number 20	12 14 15 17 57 71 80	8 9 10 11 12 13 14 15	today pursuant to a Notice to take your deposition in the adversarial proceeding that's pending in federal bankruptcy court, Case 13-02094.  The last time that we were here in this office taking a deposition, you were designated by Ohio Rock to be the spokesperson
9 10 11 12 13 14 15 16	Plaintiff's Exhibit Number 14 Plaintiff's Exhibit Number 15 Plaintiff's Exhibit Number 16 Plaintiff's Exhibit Number 17 Plaintiff's Exhibit Number 18 Plaintiff's Exhibit Number 19 Plaintiff's Exhibit Number 20 Plaintiff's Exhibit Number 21	12 14 15 17 57 71 80 81	8 9 10 11 12 13 14 15	today pursuant to a Notice to take your deposition in the adversarial proceeding that's pending in federal bankruptcy court, Case 13-02094.  The last time that we were here in this office taking a deposition, you were designated by Ohio Rock to be the spokesperson for Ohio Rock, or the person most knowledgeable
9 10 11 12 13 14 15 16 17	Plaintiff's Exhibit Number 14 Plaintiff's Exhibit Number 15 Plaintiff's Exhibit Number 16 Plaintiff's Exhibit Number 17 Plaintiff's Exhibit Number 18 Plaintiff's Exhibit Number 19 Plaintiff's Exhibit Number 20 Plaintiff's Exhibit Number 21 Plaintiff's Exhibit Number 22	12 14 15 17 57 71 80 81	8 9 10 11 12 13 14 15 16	today pursuant to a Notice to take your deposition in the adversarial proceeding that's pending in federal bankruptcy court, Case 13-02094.  The last time that we were here in this office taking a deposition, you were designated by Ohio Rock to be the spokesperson for Ohio Rock, or the person most knowledgeable about certain specific questions.
9 L0 L1 12 L3 L4 L5 L6 L7 L8	Plaintiff's Exhibit Number 14 Plaintiff's Exhibit Number 15 Plaintiff's Exhibit Number 16 Plaintiff's Exhibit Number 17 Plaintiff's Exhibit Number 18 Plaintiff's Exhibit Number 19 Plaintiff's Exhibit Number 20 Plaintiff's Exhibit Number 21 Plaintiff's Exhibit Number 22	12 14 15 17 57 71 80 81	8 9 10 11 12 13 14 15 16 17 18	today pursuant to a Notice to take your deposition in the adversarial proceeding that's pending in federal bankruptcy court, Case 13-02094.  The last time that we were here in this office taking a deposition, you were designated by Ohio Rock to be the spokesperson for Ohio Rock, or the person most knowledgeable about certain specific questions.  Today you are here as yourself,
9 110 112 113 114 115 116 117 118 119 220	Plaintiff's Exhibit Number 14 Plaintiff's Exhibit Number 15 Plaintiff's Exhibit Number 16 Plaintiff's Exhibit Number 17 Plaintiff's Exhibit Number 18 Plaintiff's Exhibit Number 19 Plaintiff's Exhibit Number 20 Plaintiff's Exhibit Number 21 Plaintiff's Exhibit Number 22	12 14 15 17 57 71 80 81	8 9 10 11 12 13 14 15 16 17 18	today pursuant to a Notice to take your deposition in the adversarial proceeding that's pending in federal bankruptcy court, Case 13-02094.  The last time that we were here in this office taking a deposition, you were designated by Ohio Rock to be the spokesperson for Ohio Rock, or the person most knowledgeable about certain specific questions.  Today you are here as yourself, Mr. Riley, so that's the reason why we're doing
9 11 12 13 14 15 16 17 18 19 20 21	Plaintiff's Exhibit Number 14 Plaintiff's Exhibit Number 15 Plaintiff's Exhibit Number 16 Plaintiff's Exhibit Number 17 Plaintiff's Exhibit Number 18 Plaintiff's Exhibit Number 19 Plaintiff's Exhibit Number 20 Plaintiff's Exhibit Number 21 Plaintiff's Exhibit Number 22	12 14 15 17 57 71 80 81	8 9 10 11 12 13 14 15 16 17 18 19 20	today pursuant to a Notice to take your deposition in the adversarial proceeding that's pending in federal bankruptcy court, Case 13-02094.  The last time that we were here in this office taking a deposition, you were designated by Ohio Rock to be the spokesperson for Ohio Rock, or the person most knowledgeable about certain specific questions.  Today you are here as yourself, Mr. Riley, so that's the reason why we're doing two separate depositions. I know you've been
9 L0 L1 L2 L3 L4 L5 L6 L7 L8 L9 20 21	Plaintiff's Exhibit Number 14 Plaintiff's Exhibit Number 15 Plaintiff's Exhibit Number 16 Plaintiff's Exhibit Number 17 Plaintiff's Exhibit Number 18 Plaintiff's Exhibit Number 19 Plaintiff's Exhibit Number 20 Plaintiff's Exhibit Number 21 Plaintiff's Exhibit Number 22	12 14 15 17 57 71 80 81	8 9 10 11 12 13 14 15 16 17 18 19 20 21	today pursuant to a Notice to take your deposition in the adversarial proceeding that's pending in federal bankruptcy court, Case 13-02094.  The last time that we were here in this office taking a deposition, you were designated by Ohio Rock to be the spokesperson for Ohio Rock, or the person most knowledgeable about certain specific questions.  Today you are here as yourself, Mr. Riley, so that's the reason why we're doing two separate depositions. I know you've been through these before, so you know basically how
9 10 11 12 13 14 15 16 17 18	Plaintiff's Exhibit Number 14 Plaintiff's Exhibit Number 15 Plaintiff's Exhibit Number 16 Plaintiff's Exhibit Number 17 Plaintiff's Exhibit Number 18 Plaintiff's Exhibit Number 19 Plaintiff's Exhibit Number 20 Plaintiff's Exhibit Number 21 Plaintiff's Exhibit Number 22	12 14 15 17 57 71 80 81	8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	today pursuant to a Notice to take your deposition in the adversarial proceeding that's pending in federal bankruptcy court, Case 13-02094.  The last time that we were here in this office taking a deposition, you were designated by Ohio Rock to be the spokesperson for Ohio Rock, or the person most knowledgeable about certain specific questions.  Today you are here as yourself, Mr. Riley, so that's the reason why we're doing two separate depositions. I know you've been through these before, so you know basically how they work. If you don't understand my

_	<b>CE</b> (	ORGE MICHAEL RILEY, SR.	۱) ، اد	November 4, 2013)
		Page (	5	Page 7
	1	Mr. Riley?	1	A. If it's I don't know.
	2	A. 594 Moull Street, Newark, Ohio.	2	MR. GUNNER: Well, you haven't closed
	3	Q. Same place you were living last time?	3	it out, right?
	4	A. Yes.	4	THE WITNESS: No.
	5	Q. And who's currently paying the rent	5	MR. BECKER: Let's mark this as an
	6	at that address?	6	exhibit.
	7	A. Me.	7	(Plaintiff's Exhibit Number 12 was
	8	Q. And what bank account are you using	8	marked for identification.)
	9	to pay the rent out of?	9	THE WITNESS: If this has anything to
	10	A. I don't have one.	10	do with Ohio Rock, I can't speak on their
	11	Q. Well, how are you paying the rent?	11	behalf without them present.
	12	A. Cash.	12	Q. Sir, I've handed you what's marked as
	13	Q. Who do you pay it to?	13	Exhibit 12. You and your counsel, could you
Ì	14	A. To the land owner.	14	take a look at that for me for a second? Let
	15	Q. Who is that?	15	me know when you've had a chance to review it.
	16	A. I can't think of his name right now.	16	All I'm going to ask you about is
	17	Q. Where is it at?	17	this is a document from PNC Bank from the
	18	A. If it comes to me, I will let you	18	account that you identified at the last
	19	know.	19	deposition for Ohio Rock is six pages, and they
	20	Q. No, where is the person who you pay	20	are marked PNC001 through 6, and I'm going to
	21	the cash to?	21	ask you about the third of those pages. Let me
	22	A. He comes by the condo.	22	know when you've had a chance to review that.
	23	Q. So you have no bank accounts?	23	Have you reviewed what has been marked as
	24	A. No.	24	Exhibit 12, sir?
	25	Q. No access to any bank accounts?	25	A. I looked at it.
	~~~~	,		
		Page 6	3	Page 8
	1	A. No.	1	Q. Yeah. Is that your signature that
	2	Q. When is the last time you had access	2	appears on the third page next to your name,
	3	to a bank account?	3	George Michael Riley, Senior, manager?
	4	A. I don't remember.	4	A. It could be.
	5	Q. Within the last three months?	5	Q. Well, is it or is it not?
	6	A. I don't remember.	6	A. It looks like it.
	7	Q. We produced documents during the Ohio	7	Q. And you are a signatore, then, on the
	8	Rock deposition from a bank account that you	8	bank account for PNC Bank for Ohio Rock
	9	controlled for Ohio Rock, and those indicated	9	Industries, Limited, correct?
	10	that the last documents that you produced were	10	A. Okay.
-	11	in May of 2013. Have you had correspondence	11	Q. Correct?
-	12	from PNC Bank since May of 2013?	12	A. Yes.
	13	A. I don't know if that's the correct	13	Q. And you haven't closed that account,
	14	date, so, again, I'll say I don't know.	14	right?
	15	Q. Did you close the Ohio Rock bank	15	A. I answered that.
	16	account?	16	MR. BECKER: Let's mark this one as
	17	A. I did not.	17	13.
	18	Q. Has anybody closed it?	18	(Plaintiff's Exhibit Number 13 was
	19	A. I don't know.	19	marked for identification.)
	20	Q. Are you still getting statements?	20	Q. I'm handing you what's labeled as
	21	A. I don't.	21	Defendant's exhibit actually, Plaintiff's
	22	Q. Do you still have the P.O. Box where	22	Exhibit 13. Sorry about that. These are
	23	the statements from PNC Bank were going to?	23	documents that we obtained from the domestic
	24	A. I haven't been there.	24	relations proceeding that you are involved in
	25	Q. But you still have it?	25	in Licking County, Ohio, Case 12-DR-01340.

GE	ORGE MICHAEL' RILEY, SR."	`	November 4, 20
	Page 9		Page 1
1	Let me know when you've had a chance	1	A. How did I get here?
2	to confirm that that's the document you have in	2	
3	front of you, and I'll ask you just, first of	3	, we discontinuous and the second sec
4	all, whether these are documents that you filed	4	Q. Whose car did you borrow?
5	in that proceeding?	5	
6	A. That would be documents that an	6	Q. What kind of car is it?
7	attorney filed, I guess, on my behalf.	7	
8	Q. All right. So Exhibit 13 are all	8	Q. What kind of car is it?
9	documents that were filed on your behalf in the	9	A. It's a it's a Chevy of some kind.
10	George M. Riley, Senior, versus Katharine C.	10	Q. Is it a car that you drive regularly
11	Riley divorce proceeding, correct? Correct?	11	or did you borrow it just for today?
12	A. I don't know.	12	A. It's a car that I'm using for today
13	Q. Well, they are file stamped in that	13	or tomorrow.
14	case, are they not, on the top right, first	14	
15	page? You can see the stamp, January 2, 2013,	15	
16	Gary Walters, Clerk?	16	* *
17	A. Okay.	17	
18	Q. Is the handwriting on those documents	18	
19	yours?	19	` ;
20	A. No.	20	•
21	Q. Did you review these documents before	21	
22	they were filed on your behalf?	22	
23	A. I don't remember.	23	· · · · · · · · · · · · · · · · · · ·
24	Q. Who gave you the information that's contained in them?	24	
25	contained in them;	25	have you been driving: what cars have you been
	Page 10		Page 1
1	A. Excuse me?	1	driving?
2	Q. The information that's contained on	2	A. Off and on, all my life.
3	the document, you know, the numbers and the	3	<b>7</b> 1
4	data, where did that information come from? Did	4	have you been driving since you got out of
5	you provide it?	5	
6	A. I may have.	6	
7	Q. Is that your signature on the	7	
8	about the seventh page in of the exhibit? It	8	1 1
9	says seven of seven.	9	
10	A. Yes.	10	•
11	Q. That is your signature?	11	2 3
12	A. Yes.	12	•
13	Q. So you reviewed the information	13	
14	before it was filed on your behalf?	14	
15	A. Okay. Q. Did you or did you not?	16	
16 17	A. I may have. I don't remember.	17	
18	Q. Well, sir, this says that you are	18	
19	swearing to the accuracy of these statements	19	
20	under oath when you signed it.	20	
		120	
1		21	O. I want you to take a look at what has
21	A. Okay.	21	
21 22	<ul><li>A. Okay.</li><li>Q. So did you swear to the accuracy of</li></ul>	22	now been marked as Plaintiff's Exhibit 14.
21 22 23	<ul><li>A. Okay.</li><li>Q. So did you swear to the accuracy of these statements under oath?</li></ul>		now been marked as Plaintiff's Exhibit 14. It's a copy of your Ohio driver's license; is
21 22	<ul><li>A. Okay.</li><li>Q. So did you swear to the accuracy of</li></ul>	22 23	now been marked as Plaintiff's Exhibit 14. It's a copy of your Ohio driver's license; is it not?

GE	ORGE MICHAEL' RILEY, SR.	`	November 4, 2013
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1	Q. Have you ever resided at T111 Riley	1	Q. And is the information true and
2	Road in Barton, Ohio?	2	accurate that's contained therein?
3	A. Yes.	3	A. To the best of my knowledge.
4	Q. When is the last time you resided	4	Q. Have you
5	there?	5	(Plaintiff's Exhibit Number 16 was
6	A. I have no idea.	6	marked for identification.)
7	Q. A year ago, six years ago, ten years	7	Q. I'll hand you a copy of what we've
8	ago?	8	marked as Exhibit 16, which is a General
9	A. That's my parents' house.	9	Warranty Deed With Survivorship Rights that
10	Q. So when is the last time you lived	10	appear to have been dated September 24, 2001.
11	there?	11	Let me know when you've had a chance to look at
12	A. I could go there any time I wish.	12	this document. Have you had a chance to look
13	Q. That wasn't my question. When is the	13	at it, sir?
14	last time you lived there?	14	THE WITNESS: Mike?
15	A. What you consider living and what I	15	MR. GUNNER: He's asking you.
16	consider living could be two different	16	Q. I'm asking you.
17	considers of living.	17	A. Yes.
18	Q. When is the last time you spent more than two consecutive evenings at that	18 19	Q. Is that your signature that appears in the middle of the page where it says George
19 20	residence?	20	Michael Riley, Senior, President?
21	A. I don't remember.	21	A. It doesn't look like it, but it could
22	Q. More than five years ago?	22	be.
23	A. I don't remember.	23	Q. Well, did you sign this document or
24	Q. Do you have a driver's license in any	24	not?
25	state other than Ohio?	25	A. That's many years ago. I don't know.
			, , ,
	Page 14		Page 16
1	A. No.	1	Q. What is Mihajlo, M I H A L I'm
2	Q. Do you have a commercial driver's	2	sorry MIHAJLO, Enterprises, Inc.
3	license?	3	A. You tell me. I don't know.
4	A. I think they are a commercial	. 4	Q. Well, sir, it's got your signature as
5	driver's license.	5	the president of that company on a document
6	Q. Is it your position that this	6	that was notarized, sworn to under oath, and
7	driver's license that we've marked as Exhibit	7	filed in Belmont County Common Pleas Court. At
8	14 allows you to drive a commercial vehicle?	8	least Belmont County Court. It was filed with
9	A. I believe. I may be wrong, but	9	the court's office, or recorder's office, I
10	Q. Have you driven commercial vehicles	10	should say. So we have a document that was
11	on the interstate highways since you have been	11	filed for record in Belmont County, Ohio, on
12	released from prison?	12	September 28, 2001, listing you as the
13	<ul><li>A. A commercial vehicle?</li><li>Q. Yes, sir.</li></ul>	13	president of Mihajlo Enterprises, Inc. I'm asking you, what is Mihajlo Enterprises, Inc.?
14 15	Q. Yes, sir. A. I have not.	14 15	A. I don't know.
16	(Plaintiff's Exhibit Number 15 was	16	Q. Well, were you the president of that
17	marked for identification.)	17	company?
18	MR. BECKER: That's the bankruptcy	18	A. I don't remember.
19	pleadings.	19	Q. Does it still exist?
رحا			A. I don't know.
20	O. Sir. I've handed you what has been	20	A. LUUHLKIIOW.
20	Q. Sir, I've handed you what has been marked as Exhibit 15, which is a copy of the	20	
21	marked as Exhibit 15, which is a copy of the	21	Q. When is the last time it transacted
21 22	marked as Exhibit 15, which is a copy of the bankruptcy filing that you made in this case on		
21	marked as Exhibit 15, which is a copy of the bankruptcy filing that you made in this case on December 14, 2012. Did you review that	21 22	Q. When is the last time it transacted any business?
21 22 23	marked as Exhibit 15, which is a copy of the bankruptcy filing that you made in this case on	21 22 23	<ul><li>Q. When is the last time it transacted any business?</li><li>A. I don't know.</li></ul>

GEC	DRGE MICHAEL RILEY, SR.		November 4, 2013
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1	A. I don't know.	1	A. I don't know. I don't remember.
2	Q. How did you become the president of	2	Q. When is the last time that business,
3	it?	3	that organization did business?
4	A. I don't know.	4	A. I don't know.
5	(Plaintiff's Exhibit Number 17 was	5	Q. Is it still doing business?
6	marked for identification.)	6	A. I have no idea.
7	Q. I'll hand you a copy of what is	7	Q. Who were the other officers of United
8	marked as Exhibit 17. Let me know when you've	8	Waste Services, Inc.?
9	had a chance to look at that one. Have you	9	A. I don't know.
10	looked at the document, sir?	10	Q. Who was the owner of United Waste
11	A. I have.	11	Services, Inc.?
12	Q. Is that your signature that appears	12	A. I thought it was its own entity.
13	on the piece of correspondence?	13	Q. Did you form it?
14	A. It's very vague. I can't my copy	14	A. I don't remember.
15	is very vague.	15	Q. What is Black Diamond Demolition
16	Q. Well, I'm asking you whether you	16	Limited?
17	recognize what's there as your signature over	17	A. I have no idea.
18	the top of what is typed as G.M. Riley,	18	Q. Were you the registered agent in
19	President?	19	Tampa, Florida, for Black Diamond Demolition
20	A. It's vague.	20	Limited?
21	Q. So you can't say if it's your	21	A. I don't know.
22	signature or not?	22	Q. I'm looking at electronic articles
23	A. I cannot.	23	for organization for a Florida limited
24	Q. All right. Were you the president of	24	liability company, Black Diamond Demolition
25	Mobile Crushing & Screening in November of	25	Limited, which indicates you were the
	Page 18		Page 20
1	Page 18 2005?	1	registered agent as of I'm sorry, November
1 2	-	1 2	
	2005?		registered agent as of I'm sorry, November
2	2005? A. I don't remember.	2	registered agent as of I'm sorry, November 30, 2005. Is that true or not true?  A. Make it an exhibit and let us see the information. You're reading across the table
2	<ul><li>2005?</li><li>A. I don't remember.</li><li>Q. Have you ever been president of</li></ul>	2	registered agent as of I'm sorry, November 30, 2005. Is that true or not true?  A. Make it an exhibit and let us see the information. You're reading across the table of something we have no idea of.
2 3 4	2005? A. I don't remember. Q. Have you ever been president of Mobile Crushing & Screening? A. I don't know. Q. Did you ever represent to anyone that	2 3 4	registered agent as of I'm sorry, November 30, 2005. Is that true or not true?  A. Make it an exhibit and let us see the information. You're reading across the table of something we have no idea of.  Q. I'm just asking you, sir, were you
2 3 4 5	2005? A. I don't remember. Q. Have you ever been president of Mobile Crushing & Screening? A. I don't know.	2 3 4 5	registered agent as of I'm sorry, November 30, 2005. Is that true or not true?  A. Make it an exhibit and let us see the information. You're reading across the table of something we have no idea of.  Q. I'm just asking you, sir, were you the registered agent for Black Diamond
2 3 4 5 6	2005? A. I don't remember. Q. Have you ever been president of Mobile Crushing & Screening? A. I don't know. Q. Did you ever represent to anyone that	2 3 4 5 6	registered agent as of I'm sorry, November 30, 2005. Is that true or not true?  A. Make it an exhibit and let us see the information. You're reading across the table of something we have no idea of.  Q. I'm just asking you, sir, were you the registered agent for Black Diamond Demolition Limited in November of 2005?
2 3 4 5 6 7	2005? A. I don't remember. Q. Have you ever been president of Mobile Crushing & Screening? A. I don't know. Q. Did you ever represent to anyone that you were president of Mobile Crushing & Screening? A. I don't remember.	2 3 4 5 6 7	registered agent as of I'm sorry, November 30, 2005. Is that true or not true?  A. Make it an exhibit and let us see the information. You're reading across the table of something we have no idea of.  Q. I'm just asking you, sir, were you the registered agent for Black Diamond Demolition Limited in November of 2005?  A. I don't know.
2 3 4 5 6 7 8	A. I don't remember. Q. Have you ever been president of Mobile Crushing & Screening? A. I don't know. Q. Did you ever represent to anyone that you were president of Mobile Crushing & Screening? A. I don't remember. Q. Was Mobile Crushing and Screening's	2 3 4 5 6 7 8 9	registered agent as of I'm sorry, November 30, 2005. Is that true or not true?  A. Make it an exhibit and let us see the information. You're reading across the table of something we have no idea of.  Q. I'm just asking you, sir, were you the registered agent for Black Diamond Demolition Limited in November of 2005?  A. I don't know.  Q. Were you an officer of that entity as
2 3 4 5 6 7 8 9	A. I don't remember. Q. Have you ever been president of Mobile Crushing & Screening? A. I don't know. Q. Did you ever represent to anyone that you were president of Mobile Crushing & Screening? A. I don't remember. Q. Was Mobile Crushing and Screening's parent organization United Waste Services,	2 3 4 5 6 7 8 9 10 11	registered agent as of I'm sorry, November 30, 2005. Is that true or not true?  A. Make it an exhibit and let us see the information. You're reading across the table of something we have no idea of.  Q. I'm just asking you, sir, were you the registered agent for Black Diamond Demolition Limited in November of 2005?  A. I don't know.  Q. Were you an officer of that entity as well?
2 3 4 5 6 7 8 9	A. I don't remember. Q. Have you ever been president of Mobile Crushing & Screening? A. I don't know. Q. Did you ever represent to anyone that you were president of Mobile Crushing & Screening? A. I don't remember. Q. Was Mobile Crushing and Screening's parent organization United Waste Services, Inc.?	2 3 4 5 6 7 8 9 10 11	registered agent as of I'm sorry, November 30, 2005. Is that true or not true?  A. Make it an exhibit and let us see the information. You're reading across the table of something we have no idea of.  Q. I'm just asking you, sir, were you the registered agent for Black Diamond Demolition Limited in November of 2005?  A. I don't know.  Q. Were you an officer of that entity as well?  A. I don't know.
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A. I don't remember. Q. Have you ever been president of Mobile Crushing & Screening? A. I don't know. Q. Did you ever represent to anyone that you were president of Mobile Crushing & Screening? A. I don't remember. Q. Was Mobile Crushing and Screening's parent organization United Waste Services, Inc.? A. Was it what? Q. United Waste Services, Inc.? A. I don't know. Q. Were you the president of United Waste Services, Inc., in November of 2005? A. I don't know. Q. Were you ever the president of United Waste Services, Inc.? A. I don't know. Q. Were you ever an officer or employee	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	registered agent as of I'm sorry, November 30, 2005. Is that true or not true?  A. Make it an exhibit and let us see the information. You're reading across the table of something we have no idea of.  Q. I'm just asking you, sir, were you the registered agent for Black Diamond Demolition Limited in November of 2005?  A. I don't know.  Q. Were you an officer of that entity as well?  A. I don't know.  Q. Were you an employee of it?  A. I don't remember.  Q. Who formed it?  A. I don't know.  Q. Is it still doing business?  A. I don't know.  Q. When you were doing demolition work in Florida, what company were you utilizing?  A. I don't remember.  Q. It was Black Diamond Demolition

GEO	ORGE MICHAEL'RILEY, SR."	-	November 4, 2013
	Page 21		Page 23
1	A. I said I don't remember.	1	A. Am I familiar with it?
2	Q. You did demolition work in Tampa,	2	Q. Yes, sir.
3	Florida, did you not?	3	A. I don't know.
4	A. I did.	4	Q. Did you obtain a mortgage for that
5	Q. What company did you do it under?	5	residence?
6	A. I don't remember.	6	A. Did I?
7	Q. So it could have been Black Diamond	7	Q. Yes, sir.
8	Demolition Limited? You are not denying that,	8	A. I don't know.
9	correct?	9	Q. Who owns it now?
10	A. I don't remember.	10	A. I don't know.
11	Q. But you are not denying it?	11	Q. Did you ever own it?
12	A. I said I don't remember.	12	A. I don't know.
13	Q. That's not my question.	13	Q. So you don't deny it?
14	A. My answer is I don't remember.	14	A. I don't know.
15	Q. You don't remember if you are denying	15	Q. Did you ever live there?
16	it?	16	A. I don't remember.
17	A. No. Your question was to me, do I	17	Q. What did you do with the Dodge Ram
18	know anything about Black Diamond Demolition	18	that you bought from A&B Auto Sales in
19	Limited.	19	Bellaire?
20	Q. That wasn't my question.	20	A. I don't remember.
21	A. I don't know what your question was.	21	Q. When did you own it? A. I don't remember.
22	Repeat it, please.	22	
23	Q. My question is, are you denying that	23	Q. Do you still own it? A. I don't think so.
24	you were doing work, demolition work, for Black Diamond Demolition Limited in 2005 and '06?	25	Q. So you could?
25	Diamond Demontion Limited in 2003 and 30:	25	Q. Bo you could.
	Page 22		Page 24
1	A. No. I'm telling you I don't	1	A. I don't know.
2	remember.	2	Q. You just don't know. Okay. What did
3	Q. But you don't deny it?	3	you do with the money that you borrowed from
4	A. I don't remember.	4	Manhattan Mortgage Company?
5	Q. What is 1221 Palm Harbor, LLC?	5	A. What money was that?
6	A. I don't know.	6	Q. It was in excess of \$100,000.
7	Q. Were you affiliated with 1221 Palm	7	A. I believe you are not telling the
8	Harbor, LLC?	8	truth.
9	A. Let us see the document. We don't	9	Q. Did you borrow in excess of \$100,000
10	know. I don't know.	10	from Manhattan Mortgage Company?
11	Q. I don't have to show you anything,	11	<ul><li>A. Who is Manhattan Mortgage?</li><li>Q. I'm asking the questions, sir.</li></ul>
12	sir. I'm just asking whether you were	12 13	<ul><li>Q. I'm asking the questions, sir.</li><li>A. I can't give the answer if I don't</li></ul>
13	affiliated with 1221 Palm Harbor, LLC?  A. I don't know.	14	understand what you are saying.
14	O. You don't know if you are affiliated	15	Q. So you deny that you obtained more
15	with 1221 Palm Harbor, LLC?	16	than \$100,000 from Manhattan Mortgage Company?
16 17	A. I gave you my answer.	17	A. I don't remember.
18	Q. Your answer was you didn't know. Are	18	Q. You don't deny it, then, right?
19	you denying it or you just don't know?	19	A. I gave you my answer.
20	A. I don't know.	20	Q. Who pays your cell phone bill?
21	Q. So you don't deny it?	21	A. Excuse me?
22	A. I answered you.	22	Q. Your cell phone that you just looked
23	Q. Are you familiar with the address 300	23	at, who pays the bill?
24	Johnet, JOHNET, Drive in St. Clairsville,	24	A. My brother or my dad.
i	Ohio?	25	Q. What service is it through?
25	Ono;	25	Q. What service is it through.

GEG	ORGE MICHAEL RILEY, SR.		November 4, 2013
	Page 25		Page 27
1	A. I don't know.	1	A. I don't know.
	Q. What is Ireland Equipment Company,	2	Q. You don't deny it, do you?
2	Inc.?		A. I gave you my answer.
3		3	
4	A. I don't know.	4	~ , ,
5	Q. You used to own it, did you not?	5	that's your signature, sir.
6	A. I don't know.	6	A. I said I didn't know.
7	Q. Does it still function?	7	Q. So you don't deny it, correct?
8	A. I don't know.	8	A. I gave my answer.
9	Q. Do you still own it?	9	Q. How long were you president of
10	A. I don't know if I do or don't.	10	Ireland Equipment Company?
11	Q. What did it own when you owned it?	11	A. I don't know if I was or wasn't.
12	A. Again, I don't know if I owned it. I	12	Q. Did you sign that document indicating
13	don't remember.	13	that you were the president of Ireland
14	Q. What is at 10191 Mill Dam Road in	14	Equipment Company?
15	Hebron, Ohio?	15	A. I just gave you my answer. I don't
16	A. I don't know.	16	know.
17	Q. Before I mark this as an exhibit,	17	Q. What did you do with the assets that
18	tell me if that's your signature on the	18	Ireland Equipment Company received from the
19	A. We will mark it as an exhibit.	19	sale of the business in March of 2006?
20	Q. I don't have to mark anything as an	20	A. I don't know what you are talking
21	exhibit. You don't get to dictate what I do in	21	about.
22	the deposition. Just answer my questions.	22	Q. Ireland Equipment Company, Inc., sold
23	A. I've answered your questions. If you	23	businesses known as Sweet P Portable Toilets,
24	are going to talk to me this way, we will stop	24	Fitzgerald Sanitation, and A1 Jiffy John in
25	it now.	25	March of 2006. I'm asking you what you and
25	it now.	10	Titalen et 2000, Tital desiring year (index year anne
	- 00	<del> </del>	
	Page 26		Page 28
1	Q. Is that your signature?	1	Ireland did with the assets, the money that you
2	<ul><li>Q. Is that your signature?</li><li>A. As I said, if you are going to remain</li></ul>	2	Ireland did with the assets, the money that you got from that sale.
2	<ul><li>Q. Is that your signature?</li><li>A. As I said, if you are going to remain looking at me like this or talking to me like</li></ul>	2	Ireland did with the assets, the money that you got from that sale.  A. I don't know. And, again, I don't
2 3 4	Q. Is that your signature? A. As I said, if you are going to remain looking at me like this or talking to me like this, we will stop this deposition right now.	2 3 4	Ireland did with the assets, the money that you got from that sale.  A. I don't know. And, again, I don't understand what you are saying.
2	Q. Is that your signature? A. As I said, if you are going to remain looking at me like this or talking to me like this, we will stop this deposition right now. Q. Sir, is that your signature at the	2 3 4 5	Ireland did with the assets, the money that you got from that sale.  A. I don't know. And, again, I don't understand what you are saying.  Q. What is Palm Beach Properties
2 3 4	Q. Is that your signature? A. As I said, if you are going to remain looking at me like this or talking to me like this, we will stop this deposition right now. Q. Sir, is that your signature at the bottom of the page that I've just shown you?	2 3 4 5 6	Ireland did with the assets, the money that you got from that sale.  A. I don't know. And, again, I don't understand what you are saying.  Q. What is Palm Beach Properties Associates, LLC?
2 3 4 5	Q. Is that your signature? A. As I said, if you are going to remain looking at me like this or talking to me like this, we will stop this deposition right now. Q. Sir, is that your signature at the bottom of the page that I've just shown you? A. I don't know. Because you can't talk	2 3 4 5 6 7	Ireland did with the assets, the money that you got from that sale.  A. I don't know. And, again, I don't understand what you are saying.  Q. What is Palm Beach Properties  Associates, LLC?  A. I don't know.
2 3 4 5 6	Q. Is that your signature? A. As I said, if you are going to remain looking at me like this or talking to me like this, we will stop this deposition right now. Q. Sir, is that your signature at the bottom of the page that I've just shown you? A. I don't know. Because you can't talk to me the way you want to talk to me.	2 3 4 5 6	Ireland did with the assets, the money that you got from that sale.  A. I don't know. And, again, I don't understand what you are saying.  Q. What is Palm Beach Properties  Associates, LLC?  A. I don't know.  Q. You were the president of Palm Beach
2 3 4 5 6 7	<ul> <li>Q. Is that your signature?</li> <li>A. As I said, if you are going to remain looking at me like this or talking to me like this, we will stop this deposition right now.</li> <li>Q. Sir, is that your signature at the bottom of the page that I've just shown you?</li> <li>A. I don't know. Because you can't talk to me the way you want to talk to me.</li> <li>MR. GUNNER: Mike, don't get</li> </ul>	2 3 4 5 6 7 8 9	Ireland did with the assets, the money that you got from that sale.  A. I don't know. And, again, I don't understand what you are saying.  Q. What is Palm Beach Properties  Associates, LLC?  A. I don't know.  Q. You were the president of Palm Beach  Property Associates, LLC, were you not?
2 3 4 5 6 7 8	<ul> <li>Q. Is that your signature?</li> <li>A. As I said, if you are going to remain looking at me like this or talking to me like this, we will stop this deposition right now.</li> <li>Q. Sir, is that your signature at the bottom of the page that I've just shown you?</li> <li>A. I don't know. Because you can't talk to me the way you want to talk to me.  MR. GUNNER: Mike, don't get argumentative. Just try to answer the</li> </ul>	2 3 4 5 6 7 8	Ireland did with the assets, the money that you got from that sale.  A. I don't know. And, again, I don't understand what you are saying.  Q. What is Palm Beach Properties  Associates, LLC?  A. I don't know.  Q. You were the president of Palm Beach  Property Associates, LLC, were you not?  A. I don't know.
2 3 4 5 6 7 8	<ul> <li>Q. Is that your signature?</li> <li>A. As I said, if you are going to remain looking at me like this or talking to me like this, we will stop this deposition right now.</li> <li>Q. Sir, is that your signature at the bottom of the page that I've just shown you?</li> <li>A. I don't know. Because you can't talk to me the way you want to talk to me.  MR. GUNNER: Mike, don't get argumentative. Just try to answer the questions.</li> </ul>	2 3 4 5 6 7 8 9	Ireland did with the assets, the money that you got from that sale.  A. I don't know. And, again, I don't understand what you are saying.  Q. What is Palm Beach Properties  Associates, LLC?  A. I don't know.  Q. You were the president of Palm Beach Property Associates, LLC, were you not?  A. I don't know.  Q. Is it still in operation today?
2 3 4 5 6 7 8 9	<ul> <li>Q. Is that your signature?</li> <li>A. As I said, if you are going to remain looking at me like this or talking to me like this, we will stop this deposition right now.</li> <li>Q. Sir, is that your signature at the bottom of the page that I've just shown you?</li> <li>A. I don't know. Because you can't talk to me the way you want to talk to me.  MR. GUNNER: Mike, don't get argumentative. Just try to answer the questions.</li> <li>Q. Did you own United Way Services?</li> </ul>	2 3 4 5 6 7 8 9	Ireland did with the assets, the money that you got from that sale.  A. I don't know. And, again, I don't understand what you are saying.  Q. What is Palm Beach Properties  Associates, LLC?  A. I don't know.  Q. You were the president of Palm Beach  Property Associates, LLC, were you not?  A. I don't know.  Q. Is it still in operation today?  A. I don't know.
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GE	ORGE MICHAEL' RILEY, SR.	`	November 4, 2013
	Page 29		Page 31
1	Industries, Inc., correct?	1	A. We are friends.
2	A. I don't know. If I was I don't	2	Q. That wasn't my question.
3	remember.	3	A. I don't know your answer or I
4	Q. You were the president of American	4	don't know your question.
5	Aggregates Corporation, USA, correct?	5	Q. What is RCI Services, LLC?
6	A. I don't know.	6	A. I don't know.
7	Q. What is R&F Company of Lansing?	7	Q. RCI Services, LLC, filed a contractor
8	A. I don't know.	8	license with the West Virginia Contractor
9	Q. You were the president of R&F Company	9	Licensing Board on June 7, 2013, signed by
10	of Lansing, correct?	10	authorized company signature Laticia
11	A. I don't remember if I was.	11	Atterbury. You were listed as the applicant on
12	Q. Is it still operating today?	12	the building permit application to do
13	A. I don't know.	13	demolition work on that job.
	Q. When is the last time it operated?	14	A. I don't understand what you are
14 15	A. I don't know.	15	saying.
- 1	Q. When is the last time Continental	16	Q. The last deposition we marked as
16 17	Industries operated?	17	Plaintiff's Exhibit 11 a series of building
18	A. I don't know.	18	permits that had been produced by the City of
19	Q. When is the last time that American	19	Wheeling as Bates page 362. There is a packet
20	Aggregates Corp, USA, operated?	20	of information that begins for a demolition
21	A. I don't know.	21	permit for RCI Services, LLC. Do you see that
22	Q. And when is the last time that Palm	22	on the first page?
23	Beach Property Associates, LLC, operated?	23	A. I do.
24	A. I don't know.	24	Q. And if you look at the second page of
25	Q. What is Eagle Industries of Columbus?	25	that document, your name and signature appear,
25	Q. What is Eagle industries of Columbus.		11
	Page 30		Page 32
1	A. I don't know.	1	correct? That's on GMR 363, correct?
2	Q. You were the president of Eagle	2	A. Are you saying everything in this
3	Industries of Columbus, correct?	3	packet that's not got an exhibit to it goes
4	A. I don't remember.	4	with the front page? Is that what you are
5	Q. When is the last time that Eagle	5	saying?
6	Industries of Columbus operated?	6	Q. That's the way it was produced, yes,
7	A. I don't know.	7	sir.
8	Q. Who was Laticia Atterbury?	8	A. So you are telling me page, where
9	A. A friend of mine.	9	it's got my initial, GMR 362 follows
10	Q. And what does she have to do with you	10	Q. GMR 363, the second page of the
11	on a professional basis?	11	exhibit, sir.
12	A. I don't understand what you are	12	A. Is what are you asking about the
13	saying.	13	second page?
14	Q. Have you done business with her?	14	Q. Is that your signature and your name
15	A. I don't understand what you are	15	at the bottom left corner? It says signature
16	saying.	16	of applicant. Is that your signature, and
17	Q. Have you done any business with	17	underneath that where it says print name and it
18	Laticia Atterbury?	18	says Mike Riley?
19	A. What do you consider business?	19	A. On GMR 363, that's correct.
20	Q. I'm asking the questions, sir.	20	Q. And this was contained in a package
21	A. I don't know what you consider	21	of demolition work that was submitted by RCI
22	business.	22	Services, LLC, and if you look at the page that
23	Q. Any business whatsoever.	23	is 369 at the bottom right, GMR 369, it's
24	A. We are friends.	24	flagged for you?
25	Q. Have you done any business with her?	25	A. Okay.
	•	1	

	Page 33		Page 35
	O That is only and I attain Attaches and		friand? When did you most har?
1	Q. That is where Laticia Atterbury's	1	friend? When did you meet her?
2	signature appears on the contractor license	2	A. A long time ago.
3	that was submitted to the West Virginia	3	Q. So you've known her how long, 20
4	Contractor Licensing Board by RCI Services,	4	years?
5	LLC. Do you see that?	5	A. I don't remember. A long time.
6	A. I do.	6	Q. Where does she live?
7	Q. I'll ask you again, what is your	7	A. Oklahoma and Ohio.
8	business relationship with Ms. Atterbury?	8	Q. What other businesses does she
9	A. She's my friend.	9	operate?
10	Q. Well, she filed on a job that you	10	A. I don't know. I'm not Laticia.
11	were doing demolition work.	11	Q. Have you done business with her other
12	A. I can't speak of Laticia Atterbury,	12	than through RCI, LLC?
13	other than that's my friend.	13	A. I never said I done business with her
14	Q. Did you do the demolition work that	14	through RCI.
15	was indicated on this permit?	15	Q. The documents said you did.
16	A. I don't remember.	16	A. I could have signed for a permit.
17	Q. Were you paid by RCI Services for	17	Doesn't mean I did work.
18	your work?	18	Q. You signed a permit that was done by
19	A. No. For what work?	19	RCI Services, LLC?
20	Q. For the demolition work that you	20	A. I'm not RCI Services, LLC.
21	did.	21	Q. Did you do the work for them?
22	A. Where?	22	A. I don't remember.
23	Q. On 2295 McCulloch, M C C U L L O C H,	23	Q. You don't deny it, then, right?
24	in Wheeling, West Virginia.	24	A. I gave you my answer.
25	A. By who?	25	Q. What is Tap Leasing?
	Page 34		Page 36
	·		
1	·	1	A. I have no idea.
1 2	Q. Well, according to this, it was done		
2	Q. Well, according to this, it was done by RCI Services, but you are listed as the	1	A. I have no idea.
2	Q. Well, according to this, it was done by RCI Services, but you are listed as the applicant?	1 2	<ul><li>A. I have no idea.</li><li>Q. What is Power City Enterprises?</li></ul>
2 3 4	<ul><li>Q. Well, according to this, it was done</li><li>by RCI Services, but you are listed as the applicant?</li><li>A. To hold a permit you are talking</li></ul>	1 2 3	<ul><li>A. I have no idea.</li><li>Q. What is Power City Enterprises?</li><li>A. I don't have any idea.</li></ul>
2	<ul><li>Q. Well, according to this, it was done by RCI Services, but you are listed as the applicant?</li><li>A. To hold a permit you are talking about? It says for demolition permit</li></ul>	1 2 3 4	<ul><li>A. I have no idea.</li><li>Q. What is Power City Enterprises?</li><li>A. I don't have any idea.</li><li>Q. Have you done any work for either of</li></ul>
2 3 4 5 6	<ul><li>Q. Well, according to this, it was done by RCI Services, but you are listed as the applicant?</li><li>A. To hold a permit you are talking about? It says for demolition permit application.</li></ul>	1 2 3 4 5	<ul><li>A. I have no idea.</li><li>Q. What is Power City Enterprises?</li><li>A. I don't have any idea.</li><li>Q. Have you done any work for either of those entities?</li></ul>
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GEG	ORGE MICHAEL RILEY, SR.		November 4, 2015
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1	A. I don't remember.	1	Q. This long-time friend, you don't know
2	Q. Well, first you told me you've never	2	where he lives?
3	heard of it and now you are telling me you	3	A. Uh-uh.
4	don't deny you've been doing it?	4	Q. Who is Andy Hunter?
5	A. You said that I was. I'm just saying	5	A. I don't know.
6	I don't remember. I don't know. If you are	6	Q. You don't know Andy Hunter?
7	saying it, because I don't know. I just don't	7	A. I know the name. I don't remember.
8	remember.	8	Q. What is Jamaican Lake Owners
9	Q. Are you the owner of Terra	9	Association, Inc.?
10	Industries?	10	A. I don't know.
11	A. I don't know.	11	Q. You've never done any work for
12	Q. Where has Terra Industries done	12	Jamaican Lake Owners Association, Inc.?
13	business?	13	A. I don't know.
14	A. I don't know. I'm not Terra	14	Q. Were you an officer or director in
15	Industries. I thought we were discussing Mike	15	Jamaican Lake Owners Association, Inc.?
16	Riley.	16	A. Out of?
17	Q. We are discussing anything that Mike	17	Q. Panama City, Florida.
18	Riley has any relationship to, and right now	18	A. I don't know.
19	I'm asking what is your relationship to Terra	19	Q. When did you last live in Spring
20	Industries?	20	Hill, Tennessee?
21	A. I don't know.	21	A. I don't remember.
22	Q. Have you done work for Terra	22	Q. A year ago, three years ago, five
23	Industries in West Virginia?	23	years ago?
24	A. I don't know.	24	A. I don't remember.
25	Q. Do they have an account at True Value	25	Q. Where did you live when you lived in
1		1	
	Page 38		Page 40
1		1	·
1 2	Hardware in West Virginia?	1 2	Page 40 Spring Hill, Tennessee? A. I didn't know that I did. You said I
2	Hardware in West Virginia?  A. I don't know.		Spring Hill, Tennessee?
2 3	Hardware in West Virginia?  A. I don't know.  Q. Do you have an account at True Value	2	Spring Hill, Tennessee?  A. I didn't know that I did. You said I
2 3 4	Hardware in West Virginia?  A. I don't know.  Q. Do you have an account at True Value Hardware in West Virginia?	2 3	Spring Hill, Tennessee?  A. I didn't know that I did. You said I did. I said I don't remember.
2 3 4 5	Hardware in West Virginia?  A. I don't know.  Q. Do you have an account at True Value Hardware in West Virginia?  A. I don't know.	2 3 4	Spring Hill, Tennessee?  A. I didn't know that I did. You said I did. I said I don't remember.  Q. What is APG, Inc.?  A. I have no idea.
2 3 4 5 6	<ul> <li>Hardware in West Virginia?</li> <li>A. I don't know.</li> <li>Q. Do you have an account at True Value</li> <li>Hardware in West Virginia?</li> <li>A. I don't know.</li> <li>Q. Have you bought materials or supplies</li> </ul>	2 3 4 5	Spring Hill, Tennessee?  A. I didn't know that I did. You said I did. I said I don't remember.  Q. What is APG, Inc.?
2 3 4 5 6 7	Hardware in West Virginia?  A. I don't know.  Q. Do you have an account at True Value Hardware in West Virginia?  A. I don't know.	2 3 4 5 6	Spring Hill, Tennessee?  A. I didn't know that I did. You said I did. I said I don't remember.  Q. What is APG, Inc.?  A. I have no idea.  Q. Why did you have their bank records?
2 3 4 5 6	Hardware in West Virginia?  A. I don't know.  Q. Do you have an account at True Value Hardware in West Virginia?  A. I don't know.  Q. Have you bought materials or supplies at True Value Hardware in West Virginia?  A. I don't know.	2 3 4 5 6 7	Spring Hill, Tennessee?  A. I didn't know that I did. You said I did. I said I don't remember.  Q. What is APG, Inc.?  A. I have no idea.  Q. Why did you have their bank records?  A. I didn't know I did. You say I had them?  Q. Yes, sir.
2 3 4 5 6 7 8 9	Hardware in West Virginia?  A. I don't know. Q. Do you have an account at True Value Hardware in West Virginia? A. I don't know. Q. Have you bought materials or supplies at True Value Hardware in West Virginia? A. I don't know. Q. What is American Steel USA	2 3 4 5 6 7 8	Spring Hill, Tennessee?  A. I didn't know that I did. You said I did. I said I don't remember.  Q. What is APG, Inc.?  A. I have no idea.  Q. Why did you have their bank records?  A. I didn't know I did. You say I had them?  Q. Yes, sir.  A. Where did I have them at?
2 3 4 5 6 7 8	Hardware in West Virginia?  A. I don't know.  Q. Do you have an account at True Value Hardware in West Virginia?  A. I don't know.  Q. Have you bought materials or supplies at True Value Hardware in West Virginia?  A. I don't know.	2 3 4 5 6 7 8 9	Spring Hill, Tennessee?  A. I didn't know that I did. You said I did. I said I don't remember.  Q. What is APG, Inc.?  A. I have no idea.  Q. Why did you have their bank records?  A. I didn't know I did. You say I had them?  Q. Yes, sir.  A. Where did I have them at?  Q. Just asking you, sir, the questions.
2 3 4 5 6 7 8 9	Hardware in West Virginia?  A. I don't know. Q. Do you have an account at True Value Hardware in West Virginia? A. I don't know. Q. Have you bought materials or supplies at True Value Hardware in West Virginia? A. I don't know. Q. What is American Steel USA Corporation?	2 3 4 5 6 7 8 9	Spring Hill, Tennessee?  A. I didn't know that I did. You said I did. I said I don't remember.  Q. What is APG, Inc.?  A. I have no idea.  Q. Why did you have their bank records?  A. I didn't know I did. You say I had them?  Q. Yes, sir.  A. Where did I have them at?  Q. Just asking you, sir, the questions.  A. You said I had their belongings.
2 3 4 5 6 7 8 9 10	Hardware in West Virginia?  A. I don't know. Q. Do you have an account at True Value Hardware in West Virginia? A. I don't know. Q. Have you bought materials or supplies at True Value Hardware in West Virginia? A. I don't know. Q. What is American Steel USA Corporation? A. I don't know.	2 3 4 5 6 7 8 9 10	Spring Hill, Tennessee?  A. I didn't know that I did. You said I did. I said I don't remember.  Q. What is APG, Inc.?  A. I have no idea.  Q. Why did you have their bank records?  A. I didn't know I did. You say I had them?  Q. Yes, sir.  A. Where did I have them at?  Q. Just asking you, sir, the questions.  A. You said I had their belongings.  Where did I have them at?
2 3 4 5 6 7 8 9 10 11	Hardware in West Virginia?  A. I don't know. Q. Do you have an account at True Value Hardware in West Virginia? A. I don't know. Q. Have you bought materials or supplies at True Value Hardware in West Virginia? A. I don't know. Q. What is American Steel USA Corporation? A. I don't know. Q. Do you have any affiliation with	2 3 4 5 6 7 8 9 10 11	Spring Hill, Tennessee?  A. I didn't know that I did. You said I did. I said I don't remember.  Q. What is APG, Inc.?  A. I have no idea.  Q. Why did you have their bank records?  A. I didn't know I did. You say I had them?  Q. Yes, sir.  A. Where did I have them at?  Q. Just asking you, sir, the questions.  A. You said I had their belongings.  Where did I have them at?  Q. Do you deny ever having the bank
2 3 4 5 6 7 8 9 10 11 12	Hardware in West Virginia?  A. I don't know. Q. Do you have an account at True Value Hardware in West Virginia? A. I don't know. Q. Have you bought materials or supplies at True Value Hardware in West Virginia? A. I don't know. Q. What is American Steel USA Corporation? A. I don't know. Q. Do you have any affiliation with American Steel USA Corporation? A. I don't know. Q. Do you own it?	2 3 4 5 6 7 8 9 10 11 12 13 14 15	Spring Hill, Tennessee?  A. I didn't know that I did. You said I did. I said I don't remember.  Q. What is APG, Inc.?  A. I have no idea.  Q. Why did you have their bank records?  A. I didn't know I did. You say I had them?  Q. Yes, sir.  A. Where did I have them at?  Q. Just asking you, sir, the questions.  A. You said I had their belongings.  Where did I have them at?  Q. Do you deny ever having the bank records from APG, Inc.?
2 3 4 5 6 7 8 9 10 11 12 13	Hardware in West Virginia?  A. I don't know. Q. Do you have an account at True Value Hardware in West Virginia? A. I don't know. Q. Have you bought materials or supplies at True Value Hardware in West Virginia? A. I don't know. Q. What is American Steel USA Corporation? A. I don't know. Q. Do you have any affiliation with American Steel USA Corporation? A. I don't know. Q. Do you own it? A. I don't know.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	Spring Hill, Tennessee?  A. I didn't know that I did. You said I did. I said I don't remember.  Q. What is APG, Inc.?  A. I have no idea.  Q. Why did you have their bank records?  A. I didn't know I did. You say I had them?  Q. Yes, sir.  A. Where did I have them at?  Q. Just asking you, sir, the questions.  A. You said I had their belongings.  Where did I have them at?  Q. Do you deny ever having the bank records from APG, Inc.?  A. You said that I had them.
2 3 4 5 6 7 8 9 10 11 12 13 14 15	Hardware in West Virginia?  A. I don't know.  Q. Do you have an account at True Value Hardware in West Virginia?  A. I don't know.  Q. Have you bought materials or supplies at True Value Hardware in West Virginia?  A. I don't know.  Q. What is American Steel USA Corporation?  A. I don't know.  Q. Do you have any affiliation with American Steel USA Corporation?  A. I don't know.  Q. Do you own it?  A. I don't know.  Q. Who was Vernon Murphy?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	Spring Hill, Tennessee?  A. I didn't know that I did. You said I did. I said I don't remember.  Q. What is APG, Inc.?  A. I have no idea.  Q. Why did you have their bank records?  A. I didn't know I did. You say I had them?  Q. Yes, sir.  A. Where did I have them at?  Q. Just asking you, sir, the questions.  A. You said I had their belongings.  Where did I have them at?  Q. Do you deny ever having the bank records from APG, Inc.?  A. You said that I had them.  Q. Yes, sir.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	Hardware in West Virginia?  A. I don't know. Q. Do you have an account at True Value Hardware in West Virginia? A. I don't know. Q. Have you bought materials or supplies at True Value Hardware in West Virginia? A. I don't know. Q. What is American Steel USA Corporation? A. I don't know. Q. Do you have any affiliation with American Steel USA Corporation? A. I don't know. Q. Do you own it? A. I don't know. Q. Who was Vernon Murphy? A. Vern is a friend of mine.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Spring Hill, Tennessee?  A. I didn't know that I did. You said I did. I said I don't remember.  Q. What is APG, Inc.?  A. I have no idea.  Q. Why did you have their bank records?  A. I didn't know I did. You say I had them?  Q. Yes, sir.  A. Where did I have them at?  Q. Just asking you, sir, the questions.  A. You said I had their belongings.  Where did I have them at?  Q. Do you deny ever having the bank records from APG, Inc.?  A. You said that I had them.  Q. Yes, sir.  A. Where did I have them at?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Hardware in West Virginia?  A. I don't know. Q. Do you have an account at True Value Hardware in West Virginia? A. I don't know. Q. Have you bought materials or supplies at True Value Hardware in West Virginia? A. I don't know. Q. What is American Steel USA Corporation? A. I don't know. Q. Do you have any affiliation with American Steel USA Corporation? A. I don't know. Q. Do you own it? A. I don't know. Q. Do you own it? A. I don't know. Q. Who was Vernon Murphy? A. Vern is a friend of mine. Q. And what is his relationship to	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Spring Hill, Tennessee?  A. I didn't know that I did. You said I did. I said I don't remember.  Q. What is APG, Inc.?  A. I have no idea.  Q. Why did you have their bank records?  A. I didn't know I did. You say I had them?  Q. Yes, sir.  A. Where did I have them at?  Q. Just asking you, sir, the questions.  A. You said I had their belongings.  Where did I have them at?  Q. Do you deny ever having the bank records from APG, Inc.?  A. You said that I had them.  Q. Yes, sir.  A. Where did I have them at?  Q. I'm asking you, sir, do you deny you
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Hardware in West Virginia?  A. I don't know. Q. Do you have an account at True Value Hardware in West Virginia? A. I don't know. Q. Have you bought materials or supplies at True Value Hardware in West Virginia? A. I don't know. Q. What is American Steel USA Corporation? A. I don't know. Q. Do you have any affiliation with American Steel USA Corporation? A. I don't know. Q. Do you own it? A. I don't know. Q. Do you own it? A. I don't know. Q. Who was Vernon Murphy? A. Vern is a friend of mine. Q. And what is his relationship to American Steel USA Corporation?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Spring Hill, Tennessee?  A. I didn't know that I did. You said I did. I said I don't remember.  Q. What is APG, Inc.?  A. I have no idea.  Q. Why did you have their bank records?  A. I didn't know I did. You say I had them?  Q. Yes, sir.  A. Where did I have them at?  Q. Just asking you, sir, the questions.  A. You said I had their belongings.  Where did I have them at?  Q. Do you deny ever having the bank records from APG, Inc.?  A. You said that I had them.  Q. Yes, sir.  A. Where did I have them at?  Q. I'm asking you, sir, do you deny you had the records for APG, Inc.?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Hardware in West Virginia?  A. I don't know. Q. Do you have an account at True Value Hardware in West Virginia? A. I don't know. Q. Have you bought materials or supplies at True Value Hardware in West Virginia? A. I don't know. Q. What is American Steel USA Corporation? A. I don't know. Q. Do you have any affiliation with American Steel USA Corporation? A. I don't know. Q. Do you own it? A. I don't know. Q. Do you own it? A. I don't know. Q. Who was Vernon Murphy? A. Vern is a friend of mine. Q. And what is his relationship to American Steel USA Corporation? A. You'd have to ask him.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Spring Hill, Tennessee?  A. I didn't know that I did. You said I did. I said I don't remember.  Q. What is APG, Inc.?  A. I have no idea.  Q. Why did you have their bank records?  A. I didn't know I did. You say I had them?  Q. Yes, sir.  A. Where did I have them at?  Q. Just asking you, sir, the questions.  A. You said I had their belongings.  Where did I have them at?  Q. Do you deny ever having the bank records from APG, Inc.?  A. You said that I had them.  Q. Yes, sir.  A. Where did I have them at?  Q. I'm asking you, sir, do you deny you had the records for APG, Inc.?  A. I don't remember. But where did I
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Hardware in West Virginia?  A. I don't know.  Q. Do you have an account at True Value Hardware in West Virginia?  A. I don't know.  Q. Have you bought materials or supplies at True Value Hardware in West Virginia?  A. I don't know.  Q. What is American Steel USA Corporation?  A. I don't know.  Q. Do you have any affiliation with American Steel USA Corporation?  A. I don't know.  Q. Do you own it?  A. I don't know.  Q. Do you own it?  A. I don't know.  Q. Who was Vernon Murphy?  A. Vern is a friend of mine.  Q. And what is his relationship to American Steel USA Corporation?  A. You'd have to ask him.  Q. How do you know Mr. Murphy?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Spring Hill, Tennessee?  A. I didn't know that I did. You said I did. I said I don't remember.  Q. What is APG, Inc.?  A. I have no idea.  Q. Why did you have their bank records?  A. I didn't know I did. You say I had them?  Q. Yes, sir.  A. Where did I have them at?  Q. Just asking you, sir, the questions.  A. You said I had their belongings.  Where did I have them at?  Q. Do you deny ever having the bank records from APG, Inc.?  A. You said that I had them.  Q. Yes, sir.  A. Where did I have them at?  Q. I'm asking you, sir, do you deny you had the records for APG, Inc.?  A. I don't remember. But where did I have them at?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Hardware in West Virginia?  A. I don't know. Q. Do you have an account at True Value Hardware in West Virginia? A. I don't know. Q. Have you bought materials or supplies at True Value Hardware in West Virginia? A. I don't know. Q. What is American Steel USA Corporation? A. I don't know. Q. Do you have any affiliation with American Steel USA Corporation? A. I don't know. Q. Do you own it? A. I don't know. Q. Do you own it? A. I don't know. Q. Who was Vernon Murphy? A. Vern is a friend of mine. Q. And what is his relationship to American Steel USA Corporation? A. You'd have to ask him. Q. How do you know Mr. Murphy? A. Been a long, long-time friend.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Spring Hill, Tennessee?  A. I didn't know that I did. You said I did. I said I don't remember.  Q. What is APG, Inc.?  A. I have no idea.  Q. Why did you have their bank records?  A. I didn't know I did. You say I had them?  Q. Yes, sir.  A. Where did I have them at?  Q. Just asking you, sir, the questions.  A. You said I had their belongings.  Where did I have them at?  Q. Do you deny ever having the bank records from APG, Inc.?  A. You said that I had them.  Q. Yes, sir.  A. Where did I have them at?  Q. I'm asking you, sir, do you deny you had the records for APG, Inc.?  A. I don't remember. But where did I have them at?  Q. When is the last time you lived in
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Hardware in West Virginia?  A. I don't know.  Q. Do you have an account at True Value Hardware in West Virginia?  A. I don't know.  Q. Have you bought materials or supplies at True Value Hardware in West Virginia?  A. I don't know.  Q. What is American Steel USA Corporation?  A. I don't know.  Q. Do you have any affiliation with American Steel USA Corporation?  A. I don't know.  Q. Do you own it?  A. I don't know.  Q. Do you own it?  A. I don't know.  Q. Who was Vernon Murphy?  A. Vern is a friend of mine.  Q. And what is his relationship to American Steel USA Corporation?  A. You'd have to ask him.  Q. How do you know Mr. Murphy?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Spring Hill, Tennessee?  A. I didn't know that I did. You said I did. I said I don't remember.  Q. What is APG, Inc.?  A. I have no idea.  Q. Why did you have their bank records?  A. I didn't know I did. You say I had them?  Q. Yes, sir.  A. Where did I have them at?  Q. Just asking you, sir, the questions.  A. You said I had their belongings.  Where did I have them at?  Q. Do you deny ever having the bank records from APG, Inc.?  A. You said that I had them.  Q. Yes, sir.  A. Where did I have them at?  Q. I'm asking you, sir, do you deny you had the records for APG, Inc.?  A. I don't remember. But where did I have them at?

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1	Q. Was it a year ago, three years ago,	1	property?
2	five years ago?	2	A. I don't know.
	A. I don't remember.	3	Q. Do you have any interest or ownership
3		4	rights or receive any rent from any of the
4	•	5	following: Condominium on Sixth Avenue in
5	Harbor, Florida?	6	St. Petersburg, Florida?
6	A. I don't remember.		A. I'm waiting for the list.
7	Q. So you don't deny that you did,	7	
8	right?	8	
9	A. I don't remember.	9	A. Okay. Repeat it again, please.
10	Q. Were you getting the bank records for	10	Q. Do you have any interest in the
11	Ireland Equipment, Inc., at your P.O. Box in	11	ownership of or do you receive any rent from
12	Palm Harbor, Florida?	12	Sixth Avenue in St. Petersburg, Florida?
13	A. I don't remember.	13	A. I don't know.
14	Q. So you don't deny that you did,	14	Q. Well, do you have a condo in
15	correct?	15	St. Petersburg, Florida?
16	A. I don't remember.	16	A. I don't remember.
17	Q. Where is Ireland Equipment, Inc.,	17	Q. Do you have a condo in Palm Harbor,
18	currently sending its bank records?	18	Florida?
19	A. I don't know.	19	A. Did or now?
20	Q. Do you still get them?	20	Q. Now.
21	A. I don't remember.	21	A. I don't remember.
22	Q. What is your relationship to 904	22	Q. When is the last time you had a condo
23	Bayshore Drive in Tampa I'm sorry Tarpon	23	in Palm Harbor, Florida?
24	Springs, Florida?	24	A. I don't remember.
25	A. I don't know.	25	Q. So you used to at one time?
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			•
1	Q. You don't get any money from property	1	A. I don't know.
2	at that location?	2	Q. Condominium in Haines City, Florida,
3	A. Repeat your question, please.	3	HAINES?
4	Q. Do you get any rent from the property	4	A. I don't know.
5	at 904 Bayshore Drive, Tarpon Springs, Florida?	5	Q. Well, your wife says you do. Do you?
6	A. Do I get rent?	6	A. She said a lot of shit.
7	Q. Do you or do you not?	7	Q. I'm asking you now. This is your
8	A. I do not.	8	chance to be on the record. Do you or do you
9	Q. Did you ever rent that residence?	9	not?
10	A. I don't remember. I don't know. If	10	A. I don't remember.
11	I rented it, why would they give me rent?	11	Q. So she's right, you own it? Do you
12	Q. Who owns the residence at 511 Ohio	12	own a condo in Orlando, Florida, at the
13	Avenue in Martins Ferry, Ohio?	13	Grenelefe, G R E N E L E F E, Resort?  A. I don't know.
14	A. I don't know.	14	<del></del>
15	Q. Do you receive any rent from that	15	Q. Do you have a home in Clearwater, Florida, at the Island Estates?
16	property?	16	
17	A. I do not.	17	
18	Q. Who lives there?	18	<ul><li>Q. Clearwater, Florida, Island Estates.</li><li>A. I don't know.</li></ul>
19	A. I don't know.	19	
20	Q. What is your relationship to it?	20	Q. Do you have a cabin under construction in Virginia?
21	A. Where?	21	A. I I don't know.
22	Q. 511 Ohio Avenue, Martins Ferry,	22	
23	Ohio.	23	Q. Do you have any cabin in Virginia? Maybe it's finished now.
24	A. I don't know.	24	A. I don't know.
25	Q. You have no relationship to that	25	11. I don't know.

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1	Q. Do you have a cabin in Pigeon Forge,	1	investment interest in Ideal Image Laser Hair
2	Tennessee?	2	Removal in Tampa, Florida?
3	A. In where?	3	A. I think that's all Kate.
4	Q. Pigeon Forge, Tennessee.	4	Q. I'm asking if you have interest,
5	A. I don't know.	5	business interest in it.
6	Q. Do you have a timeshare in Washington	6	A. I don't know. I don't know what she
7	state?	7	has.
8	A. A timeshare of what?	8	Q. Do you own any land in Pennsylvania?
9	Q. I don't know.	9	A. I don't know.
10	A. I don't either.	10	Q. Do you have any ownership interest in
11	Q. Well, do you have any timeshares of	11	1157 Fair Avenue, Columbus, Ohio?
12	any kind in Washington state?	12	A. What's the address?
13	A. What's a timeshare?	13	Q. 1157 Fair Avenue.
14	Q. You don't know what a timeshare is?	14	A. Where is that at?
15	A. I'm asking you.	15	Q. Columbus, Ohio.
16	Q. You don't get to ask the questions.	16	A. I don't know.
17	A. Then I can't give an answer when I	17	Q. Do you have any ownership interest in
18	don't know what you are talking about.	18	a Hatterras, H A T T E R R A S, yacht?
19	Q. Do you have a car lot at 101 North	19	A. I don't know.
20	Zane Highway in Martins Ferry?	20	Q. Have you ever had a yacht that you've
21	A. I don't know.	21	kept in either San Diego or the Coral Ridge
22	Q. Do you have a four-car garage on	22	Yacht Club in Fort Lauderdale, Florida?
23	Blaine, B L A I N E, Road, in Blaine, Ohio?	23	A. She did or I did?
24	A. I don't know.	24	Q. You, sir.
25	Q. Do you have a triplex on Main Street	25	A. No.
	1		
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	raye 40		Page 48
1		1	·
1 2	in Bridgeport, Ohio?	1 2	Q. Have you had any ownership or other interest in 9049 Bayshore Drive, Tarpon
2	in Bridgeport, Ohio? A. I don't know.		Q. Have you had any ownership or other
2	in Bridgeport, Ohio?  A. I don't know.  Q. Do you have any auto dealerships	2	Q. Have you had any ownership or other interest in 9049 Bayshore Drive, Tarpon
2 3 4	in Bridgeport, Ohio? A. I don't know. Q. Do you have any auto dealerships anywhere?	2	Q. Have you had any ownership or other interest in 9049 Bayshore Drive, Tarpon Springs, Florida?  A. I don't know.
2 3 4 5	<ul><li>in Bridgeport, Ohio?</li><li>A. I don't know.</li><li>Q. Do you have any auto dealerships anywhere?</li><li>A. I don't know.</li></ul>	2 3 4	Q. Have you had any ownership or other interest in 9049 Bayshore Drive, Tarpon Springs, Florida?  A. I don't know.
2 3 4 5 6	in Bridgeport, Ohio?  A. I don't know. Q. Do you have any auto dealerships anywhere? A. I don't know. Q. Do you have a farm in Barnesville,	2 3 4 5	<ul> <li>Q. Have you had any ownership or other interest in 9049 Bayshore Drive, Tarpon Springs, Florida?</li> <li>A. I don't know.</li> <li>Q. Have you had any ownership or other</li> </ul>
2 3 4 5 6 7	in Bridgeport, Ohio?  A. I don't know. Q. Do you have any auto dealerships anywhere? A. I don't know. Q. Do you have a farm in Barnesville, Ohio?	2 3 4 5 6	<ul> <li>Q. Have you had any ownership or other interest in 9049 Bayshore Drive, Tarpon Springs, Florida?</li> <li>A. I don't know.</li> <li>Q. Have you had any ownership or other interest in 11400 Gulf Boulevard, Belleair</li> </ul>
2 3 4 5 6 7 8	in Bridgeport, Ohio?  A. I don't know. Q. Do you have any auto dealerships anywhere? A. I don't know. Q. Do you have a farm in Barnesville, Ohio? A. I don't know. Is this all the stuff	2 3 4 5 6 7	<ul> <li>Q. Have you had any ownership or other interest in 9049 Bayshore Drive, Tarpon Springs, Florida?</li> <li>A. I don't know.</li> <li>Q. Have you had any ownership or other interest in 11400 Gulf Boulevard, Belleair Beach, Florida?</li> </ul>
2 3 4 5 6 7 8 9	in Bridgeport, Ohio?  A. I don't know. Q. Do you have any auto dealerships anywhere? A. I don't know. Q. Do you have a farm in Barnesville, Ohio? A. I don't know. Is this all the stuff that she bought?	2 3 4 5 6 7 8	<ul> <li>Q. Have you had any ownership or other interest in 9049 Bayshore Drive, Tarpon Springs, Florida?</li> <li>A. I don't know.</li> <li>Q. Have you had any ownership or other interest in 11400 Gulf Boulevard, Belleair Beach, Florida?</li> <li>A. I don't know.</li> </ul>
2 3 4 5 6 7 8 9	in Bridgeport, Ohio?  A. I don't know. Q. Do you have any auto dealerships anywhere? A. I don't know. Q. Do you have a farm in Barnesville, Ohio? A. I don't know. Is this all the stuff that she bought? Q. Do you have an RV park in San Diego,	2 3 4 5 6 7 8 9	<ul> <li>Q. Have you had any ownership or other interest in 9049 Bayshore Drive, Tarpon Springs, Florida?</li> <li>A. I don't know.</li> <li>Q. Have you had any ownership or other interest in 11400 Gulf Boulevard, Belleair Beach, Florida?</li> <li>A. I don't know.</li> <li>Q. Do you have any ownership interest in</li> </ul>
2 3 4 5 6 7 8 9 10	in Bridgeport, Ohio?  A. I don't know. Q. Do you have any auto dealerships anywhere? A. I don't know. Q. Do you have a farm in Barnesville, Ohio? A. I don't know. Is this all the stuff that she bought?	2 3 4 5 6 7 8 9	<ul> <li>Q. Have you had any ownership or other interest in 9049 Bayshore Drive, Tarpon Springs, Florida?</li> <li>A. I don't know.</li> <li>Q. Have you had any ownership or other interest in 11400 Gulf Boulevard, Belleair Beach, Florida?</li> <li>A. I don't know.</li> <li>Q. Do you have any ownership interest in Buccaneer Bay in Sarasota, Florida?</li> </ul>
2 3 4 5 6 7 8 9 10 11	in Bridgeport, Ohio?  A. I don't know. Q. Do you have any auto dealerships anywhere? A. I don't know. Q. Do you have a farm in Barnesville, Ohio? A. I don't know. Is this all the stuff that she bought? Q. Do you have an RV park in San Diego, California? A. I don't know.	2 3 4 5 6 7 8 9 10	<ul> <li>Q. Have you had any ownership or other interest in 9049 Bayshore Drive, Tarpon Springs, Florida?</li> <li>A. I don't know.</li> <li>Q. Have you had any ownership or other interest in 11400 Gulf Boulevard, Belleair Beach, Florida?</li> <li>A. I don't know.</li> <li>Q. Do you have any ownership interest in Buccaneer Bay in Sarasota, Florida?</li> <li>A. What is it?</li> </ul>
2 3 4 5 6 7 8 9 10 11 12 13	in Bridgeport, Ohio?  A. I don't know. Q. Do you have any auto dealerships anywhere? A. I don't know. Q. Do you have a farm in Barnesville, Ohio? A. I don't know. Is this all the stuff that she bought? Q. Do you have an RV park in San Diego, California? A. I don't know. Q. Do you have an RV park in Florida?	2 3 4 5 6 7 8 9 10 11	<ul> <li>Q. Have you had any ownership or other interest in 9049 Bayshore Drive, Tarpon Springs, Florida?</li> <li>A. I don't know.</li> <li>Q. Have you had any ownership or other interest in 11400 Gulf Boulevard, Belleair Beach, Florida?</li> <li>A. I don't know.</li> <li>Q. Do you have any ownership interest in Buccaneer Bay in Sarasota, Florida?</li> <li>A. What is it?</li> <li>Q. Buccaneer Bay.</li> </ul>
2 3 4 5 6 7 8 9 10 11 12 13 14	in Bridgeport, Ohio?  A. I don't know. Q. Do you have any auto dealerships anywhere? A. I don't know. Q. Do you have a farm in Barnesville, Ohio? A. I don't know. Is this all the stuff that she bought? Q. Do you have an RV park in San Diego, California? A. I don't know. Q. Do you have an RV park in Florida? A. I don't know. A. I don't know.	2 3 4 5 6 7 8 9 10 11 12	<ul> <li>Q. Have you had any ownership or other interest in 9049 Bayshore Drive, Tarpon Springs, Florida?</li> <li>A. I don't know.</li> <li>Q. Have you had any ownership or other interest in 11400 Gulf Boulevard, Belleair Beach, Florida?</li> <li>A. I don't know.</li> <li>Q. Do you have any ownership interest in Buccaneer Bay in Sarasota, Florida?</li> <li>A. What is it?</li> <li>Q. Buccaneer Bay.</li> <li>A. What is that?</li> </ul>
2 3 4 5 6 7 8 9 10 11 12 13 14 15	in Bridgeport, Ohio?  A. I don't know. Q. Do you have any auto dealerships anywhere? A. I don't know. Q. Do you have a farm in Barnesville, Ohio? A. I don't know. Is this all the stuff that she bought? Q. Do you have an RV park in San Diego, California? A. I don't know. Q. Do you have an RV park in Florida? A. I don't know. Q. Do you have a percentage of a	2 3 4 5 6 7 8 9 10 11 12 13 14	<ul> <li>Q. Have you had any ownership or other interest in 9049 Bayshore Drive, Tarpon Springs, Florida?</li> <li>A. I don't know.</li> <li>Q. Have you had any ownership or other interest in 11400 Gulf Boulevard, Belleair Beach, Florida?</li> <li>A. I don't know.</li> <li>Q. Do you have any ownership interest in Buccaneer Bay in Sarasota, Florida?</li> <li>A. What is it?</li> <li>Q. Buccaneer Bay.</li> <li>A. What is that?</li> <li>Q. I don't know.</li> </ul>
2 3 4 5 6 7 8 9 10 11 12 13 14	in Bridgeport, Ohio?  A. I don't know. Q. Do you have any auto dealerships anywhere? A. I don't know. Q. Do you have a farm in Barnesville, Ohio? A. I don't know. Is this all the stuff that she bought? Q. Do you have an RV park in San Diego, California? A. I don't know. Q. Do you have an RV park in Florida? A. I don't know. Q. Do you have a percentage of a business called The DollHouse in Tampa,	2 3 4 5 6 7 8 9 10 11 12 13 14 15	<ul> <li>Q. Have you had any ownership or other interest in 9049 Bayshore Drive, Tarpon Springs, Florida?</li> <li>A. I don't know.</li> <li>Q. Have you had any ownership or other interest in 11400 Gulf Boulevard, Belleair Beach, Florida?</li> <li>A. I don't know.</li> <li>Q. Do you have any ownership interest in Buccaneer Bay in Sarasota, Florida?</li> <li>A. What is it?</li> <li>Q. Buccaneer Bay.</li> <li>A. What is that?</li> <li>Q. I don't know.</li> <li>A. I don't either.</li> </ul>
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	in Bridgeport, Ohio?  A. I don't know. Q. Do you have any auto dealerships anywhere? A. I don't know. Q. Do you have a farm in Barnesville, Ohio? A. I don't know. Is this all the stuff that she bought? Q. Do you have an RV park in San Diego, California? A. I don't know. Q. Do you have an RV park in Florida? A. I don't know. Q. Do you have a percentage of a business called The DollHouse in Tampa, Florida?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	Q. Have you had any ownership or other interest in 9049 Bayshore Drive, Tarpon Springs, Florida?  A. I don't know. Q. Have you had any ownership or other interest in 11400 Gulf Boulevard, Belleair Beach, Florida?  A. I don't know. Q. Do you have any ownership interest in Buccaneer Bay in Sarasota, Florida?  A. What is it? Q. Buccaneer Bay. A. What is that? Q. I don't know. A. I don't either. Q. So you have no ownership interest in
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	in Bridgeport, Ohio?  A. I don't know. Q. Do you have any auto dealerships anywhere? A. I don't know. Q. Do you have a farm in Barnesville, Ohio? A. I don't know. Is this all the stuff that she bought? Q. Do you have an RV park in San Diego, California? A. I don't know. Q. Do you have an RV park in Florida? A. I don't know. Q. Do you have a percentage of a business called The DollHouse in Tampa, Florida? A. What is it again?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	Q. Have you had any ownership or other interest in 9049 Bayshore Drive, Tarpon Springs, Florida?  A. I don't know. Q. Have you had any ownership or other interest in 11400 Gulf Boulevard, Belleair Beach, Florida?  A. I don't know. Q. Do you have any ownership interest in Buccaneer Bay in Sarasota, Florida?  A. What is it? Q. Buccaneer Bay. A. What is that? Q. I don't know. A. I don't either. Q. So you have no ownership interest in anything in Buccaneer Bay? A. I don't know. Q. Do you have any ownership interest in
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	in Bridgeport, Ohio?  A. I don't know. Q. Do you have any auto dealerships anywhere? A. I don't know. Q. Do you have a farm in Barnesville, Ohio? A. I don't know. Is this all the stuff that she bought? Q. Do you have an RV park in San Diego, California? A. I don't know. Q. Do you have an RV park in Florida? A. I don't know. Q. Do you have a percentage of a business called The DollHouse in Tampa, Florida? A. What is it again? Q. It's a business called The DollHouse	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	<ul> <li>Q. Have you had any ownership or other interest in 9049 Bayshore Drive, Tarpon Springs, Florida?</li> <li>A. I don't know.</li> <li>Q. Have you had any ownership or other interest in 11400 Gulf Boulevard, Belleair Beach, Florida?</li> <li>A. I don't know.</li> <li>Q. Do you have any ownership interest in Buccaneer Bay in Sarasota, Florida?</li> <li>A. What is it?</li> <li>Q. Buccaneer Bay.</li> <li>A. What is that?</li> <li>Q. I don't know.</li> <li>A. I don't either.</li> <li>Q. So you have no ownership interest in anything in Buccaneer Bay?</li> <li>A. I don't know.</li> </ul>
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	in Bridgeport, Ohio?  A. I don't know. Q. Do you have any auto dealerships anywhere? A. I don't know. Q. Do you have a farm in Barnesville, Ohio? A. I don't know. Is this all the stuff that she bought? Q. Do you have an RV park in San Diego, California? A. I don't know. Q. Do you have an RV park in Florida? A. I don't know. Q. Do you have a percentage of a business called The DollHouse in Tampa, Florida? A. What is it again? Q. It's a business called The DollHouse in Tampa, Florida. A. I don't know.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	<ul> <li>Q. Have you had any ownership or other interest in 9049 Bayshore Drive, Tarpon Springs, Florida?</li> <li>A. I don't know.</li> <li>Q. Have you had any ownership or other interest in 11400 Gulf Boulevard, Belleair Beach, Florida?</li> <li>A. I don't know.</li> <li>Q. Do you have any ownership interest in Buccaneer Bay in Sarasota, Florida?</li> <li>A. What is it?</li> <li>Q. Buccaneer Bay.</li> <li>A. What is that?</li> <li>Q. I don't know.</li> <li>A. I don't either.</li> <li>Q. So you have no ownership interest in anything in Buccaneer Bay?</li> <li>A. I don't know.</li> <li>Q. Do you have any ownership interest in Siesta Key, Florida, any place in Siesta Key,</li> </ul>
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	in Bridgeport, Ohio?  A. I don't know. Q. Do you have any auto dealerships anywhere? A. I don't know. Q. Do you have a farm in Barnesville, Ohio? A. I don't know. Is this all the stuff that she bought? Q. Do you have an RV park in San Diego, California? A. I don't know. Q. Do you have an RV park in Florida? A. I don't know. Q. Do you have a percentage of a business called The DollHouse in Tampa, Florida? A. What is it again? Q. It's a business called The DollHouse in Tampa, Florida. A. I don't know. Q. Do you have any ownership interest	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Q. Have you had any ownership or other interest in 9049 Bayshore Drive, Tarpon Springs, Florida?  A. I don't know. Q. Have you had any ownership or other interest in 11400 Gulf Boulevard, Belleair Beach, Florida?  A. I don't know. Q. Do you have any ownership interest in Buccaneer Bay in Sarasota, Florida?  A. What is it? Q. Buccaneer Bay. A. What is that? Q. I don't know. A. I don't either. Q. So you have no ownership interest in anything in Buccaneer Bay? A. I don't know. Q. Do you have any ownership interest in Siesta Key, Florida?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	in Bridgeport, Ohio?  A. I don't know. Q. Do you have any auto dealerships anywhere? A. I don't know. Q. Do you have a farm in Barnesville, Ohio? A. I don't know. Is this all the stuff that she bought? Q. Do you have an RV park in San Diego, California? A. I don't know. Q. Do you have an RV park in Florida? A. I don't know. Q. Do you have a percentage of a business called The DollHouse in Tampa, Florida? A. What is it again? Q. It's a business called The DollHouse in Tampa, Florida. A. I don't know.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	<ul> <li>Q. Have you had any ownership or other interest in 9049 Bayshore Drive, Tarpon Springs, Florida?</li> <li>A. I don't know.</li> <li>Q. Have you had any ownership or other interest in 11400 Gulf Boulevard, Belleair Beach, Florida?</li> <li>A. I don't know.</li> <li>Q. Do you have any ownership interest in Buccaneer Bay in Sarasota, Florida?</li> <li>A. What is it?</li> <li>Q. Buccaneer Bay.</li> <li>A. What is that?</li> <li>Q. I don't know.</li> <li>A. I don't either.</li> <li>Q. So you have no ownership interest in anything in Buccaneer Bay?</li> <li>A. I don't know.</li> <li>Q. Do you have any ownership interest in Siesta Key, Florida, any place in Siesta Key, Florida?</li> <li>A. Not that I know of.</li> </ul>
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	in Bridgeport, Ohio?  A. I don't know. Q. Do you have any auto dealerships anywhere? A. I don't know. Q. Do you have a farm in Barnesville, Ohio? A. I don't know. Is this all the stuff that she bought? Q. Do you have an RV park in San Diego, California? A. I don't know. Q. Do you have an RV park in Florida? A. I don't know. Q. Do you have a percentage of a business called The DollHouse in Tampa, Florida? A. What is it again? Q. It's a business called The DollHouse in Tampa, Florida. A. I don't know. Q. Do you have any ownership interest with Vince Promuto, P R O M U T O?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	<ul> <li>Q. Have you had any ownership or other interest in 9049 Bayshore Drive, Tarpon Springs, Florida?</li> <li>A. I don't know.</li> <li>Q. Have you had any ownership or other interest in 11400 Gulf Boulevard, Belleair Beach, Florida?</li> <li>A. I don't know.</li> <li>Q. Do you have any ownership interest in Buccaneer Bay in Sarasota, Florida?</li> <li>A. What is it?</li> <li>Q. Buccaneer Bay.</li> <li>A. What is that?</li> <li>Q. I don't know.</li> <li>A. I don't either.</li> <li>Q. So you have no ownership interest in anything in Buccaneer Bay?</li> <li>A. I don't know.</li> <li>Q. Do you have any ownership interest in Siesta Key, Florida?</li> <li>A. Not that I know of.</li> <li>Q. Do you have any ownership interest in</li> </ul>

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1	Q. Do you have any ownership interest in	1	Q. Do you know her?
2	anything in South Pointe Shores, Florida?	2	A. I don't remember.
3	A. Not that I know of.	3	Q. What is Sonrise Capital, Inc.?
4	Q. Do you have any ownership interest in	4	A. I don't know.
5	anything in Bay Island, Florida?	5	Q. You don't have any business
6	A. Not that I know of.	6	relationship with Sonrise, that business, SON
7	Q. Do you have any ownership interest in	7	R I S E, Capital, Inc.?
8	Swinging Branch in Miami, Florida?	8	A. From where?
9	A. What is it?	9	Q. Do you have any business relationship
	Q. Swinging Branch in Miami, Florida.	10	with Sonrise Capital, Inc.?
10	A. Not that I know of. Sounds like I'm	11	A. From where? I don't know.
11	Bill Gates.	12	Q. Are you the owner of Sonrise Capital,
12	Q. Are you the beneficiary of an estate	13	Inc.?
13	from your grandfather in the name of Prometheus	14	A. From where? I don't know.
14	Trust?	15	Q. Did you have credit cards in the name
15	A. I don't know.	16	of Sonrise Capital, Inc., that you used?
1.6		17	A. I don't know.
17	<ul><li>Q. So you don't deny that?</li><li>A. I don't know.</li></ul>	18	Q. Did you set up a company called
18		19	Sonrise Capital, Inc.?
19	Q. The Prometheus, PROMETHEUS,	20	A. I don't remember.
20	irrevocable trust was originally the owner of	21	Q. Did you set up a company called
21	Ohio Rock Industries Limited, correct?	22	Florida Rock?
22	A. I don't know.	23	A. I don't remember.
23	Q. And are you a beneficiary of that	24	Q. So you don't deny it?
24	trust?	25	A. I don't remember.
25	A. How would I know? Do they send you	25	A. I don't remember.
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١.		1	Q. Are you still operating either
1	something in the mail?	2	Sonrise Capital or Florida Rock?
2	Q. What are your grandparents' names?  A. I don't know.	3	A. I don't know.
3		4	Q. Who is John I'm sorry, Joan
4	Q. You don't the names of your	5	Andrew?
5	grandparents?	6	A. I don't know.
6	·	7	Q. Don't know her?
7	Grandpop Riley.	8	A. Could be one of Kate's friends. I
8	Q. On the other side.	9	don't know.
9	A. I really didn't know them that well.	10	Q. Ever provided her with a plane ticket
10	Q. Who is Michelle Blizzard?	11	to Columbus, Ohio?
11	A. That name rings familiar. I don't	12	A. I don't know.
12	remember.		Q. So you don't deny it?
13	Q. She lives in Somerset, Ohio?	13	A. I don't know. Kate could have done a
14	A. I don't remember. The name sounds	14	lot of things.
15	familiar.	15	- T
16	Q. Do you have any children with her?	16	Q. I'm not asking about Kate. I'm asking about you.
17	A. Do I have what?	17	A. I don't know.
18	Q. A child.	18	
19	A. Well, if she's claiming I guess I	19	Q. You never provided this woman, Joan Andrew, with a plane ticket to travel to
20	don't know. Is it a boy or a girl? I went	20	
21	from Bill Gates to John Holmes.	21	Columbus, Ohio?  A. I don't remember.
22	Q. Who is Teresa Duff?	22	
23	A. I don't know.	23	Q. Do you supply lots of people with
24	Q. What about Teresa O'Bryan?	24	plane tickets to Columbus, Ohio, that you
			•
25	A. That name sounds familiar.	25	wouldn't remember that?

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,	A. I don't remember. I don't remember.	1	Q. I don't know.
1	Q. Ever drove her around	2	A. Where was it established? Do you
2	St. Clairsville?	3	know?
3	A. I don't remember.	4	Q. I don't know.
4			A. I can't answer. I don't know.
5	Q. Did you tell her you owned coal mines	5	
6	and a chain of gas station operations?	6	Q. Did you ever do any business with
7	A. Did I do what?	7	Fifth Third Bank?
8	Q. Did you represent to her that you	8	A. I don't know.
9	owned coal mines and a chain of gas stations?	9	Q. Ever had an account at Fifth Third
10	A. No.	10	Bank?
11	Q. You deny that?	11	A. I don't know.
12	A. Yes.	12	Q. Have any of your companies that you
13	Q. Who is Adam Green?	13	controlled had an account with Fifth Third
14	A. Excuse me?	14	Bank?
15	Q. Adam Green.	15	A. I don't remember if they did or
16	A. I don't know.	16	didn't.
17	Q. Have you ever had any business	17	Q. Have you done any business with
18	dealings at Green Real Estate Group, LLC, in	18	Harvey Goodwin Realtor?
19	Tennessee?	19	A. I don't know.
20	A. I don't know.	20	Q. Have any of your companies that you
21	Q. So you don't deny that?	21	controlled done business with Harvey Goodwin
22	A. I don't know.	22	Realtor?
23	Q. Are you familiar with Ferman BMW in	23	A. I don't know.
24	Palm Harbor, Florida?	24	Q. You don't know anything about Harvey
25	A. I don't know.	25	Goodwin Realtor? They have offices in
-			·
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	Q. Did you ever attempt to buy or lease	1	St. Clairsville, Martins Ferry, Barnesville,
1	a vehicle from Jeffrey Sterns at Ferman BMW in	2	and Wheeling.
2	Palm Harbor, Florida?	3	A. I don't remember.
3	A. I don't remember.	4	Q. You don't deny that you have done
4		5	business with them, you just don't remember?
5	Q. So you don't deny that?	5	A. I don't remember.
6	A. I don't know. I think Kate and him	0	
7	worked together. I don't know.	7	•
8	Q. What is Malco Products of Ohio,	8	
9	Inc.?	9	Q. Yes, sir.
10	A. What is what?	10	A. I was in prison, I think, with his
11	Q. Malco Products of Ohio, Inc., MALC	11	dad.
12	O.	12	Q. And then afterwards you let him start
13	A. I don't know.	13	living at 5119 Ohio Avenue in Martins Ferry,
14	Q. You don't have any relationship to or	14	Ohio?
15	knowledge of Malco Products, Inc.?	15	A. Excuse me?
16	A. I don't know.	16	Q. You let him live at 511
17	Q. Did you do business with them?	17	A. I did?
18	A. I don't know.	18	Q. Yes, sir. Did you?
19	Q. Do you own them?	19	A. I don't know. You said that. I
20	A. I don't know.	20	didn't say that.
21	Q. What is Mikate Company, Inc.?	21	Q. I'm asking you to deny or confirm
22	A. I think that's Kate.	22	it.
23	Q. Were you the statutory agent for	23	A. I don't remember.
24	Mikate Company, Inc.?	24	Q. So you don't deny it?
25	A. When was it established?	25	A. I answered you.
		1	•

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۱,	Q. I asked you earlier	1	Q. It indicates that George M. Riley,
1	A. You said that I let him live there.	2	Senior, holding interest in the said companies
2	I believe I was in prison. If I did something	3	hereby appoint as my true and lawful attorney
3		·	in fact in my stead and for myself as my agent
4	then, I don't know. You know more about it	4	
5	than I do.	5	to sign on behalf of all said companies below.
6	Q. Did you let Mr. Levi Weaver reside at	6	Do you see that?
7	511 Ohio Avenue in Martins Ferry, Ohio?	7	A. I do.
8	A. I don't remember.	8	Q. And then there's a list of
9	Q. So you don't deny it?	9	companies. So what is Riley Enterprise?
10	A. I don't remember.	10	A. I don't know.
11	Q. Well, have you ever let anybody live	11	Q. You never had a company called Riley
12	at 511 Ohio Avenue in Martins Ferry, Ohio?	12	Enterprise?
13	A. I don't know. I don't remember.	13	A. I don't remember.
14	Q. What is at that residence?	14	Q. What is Ohio Coal?
15	A. I don't know. You've said that I let	15	A. I don't know.
16	him, is that what you are saying?	16	Q. Never had a company called Ohio Coal?
17	(Plaintiff's Exhibit Number 18 was	17	A. Not to my knowledge.
18	marked for identification.)	18	Q. What is R&F Coal?
19	Q. I've handed you what's marked as	19	A. I don't know.
20	Exhibit 18.	20	Q. Never had a company called R&F Coal?
21	A. Kate typed this up when I was in	21	A. Not to my knowledge.
22	prison.	22	Q. Are any of these companies yours?
	Q. You indicated that your wife typed	23	A. I don't know.
23	this up for you?	24	Q. So you don't deny that they are?
24	A. Excuse me?	25	A. I don't know.
25	A. Excuse me!		11. I don't know.
	Page 58	3	Page 60
1	Q. Did your wife type this up for you	1	Q. Well, let's go through them one at a
2	while you were in prison?	2	time then. Lorain Dock, what is Lorain Dock?
1	A. I don't remember.	3	A. I don't know.
3		4	Q. You've never had a company called
4		5	Lorain Dock?
5		5	A. I don't know.
6	Q. Did you type it up?	7	Q. Riley Mining Company, what is Riley
7	A. She sent me a lot of things.		Mining Company?
8	Q. Did she send you this?	8	A. I don't know.
9	A. I don't remember.	9	44 4 - 44
10	Q. Have you seen this document before	10	
11	today?	11	Mining Company?
12	A. I don't remember.	12	A. I don't know.
13	Q. Sir, you just told your lawyer that	13	Q. What is Community Fuels?
14	Kate typed this up for you while you were in	14	A. I don't know.
15	prison. Now you are telling me you've never	15	Q. Have you ever had a company called
16	seen it?	16	Community Fuels?
17	A. I don't know. I'm still reviewing	17	A. I don't remember.
18	it.	18	Q. What is Belmont Oil?
19	Q. Take your time. It's all of two	19	A. I don't know.
20	pages.	20	Q. You've never had a company called
21	A. Okay. I have a hard time reading.	21	Belmont Oil?
22	Two pages could be a lot to me.	22	A. I don't remember.
23	Q. Let me know when you've had a	23	Q. What is Liberty Oil, Florida?
24	chance:	24	A. I don't know.
25	A. I reviewed it.	25	Q. Have you ever had a company called
"			^ *

Case 2:13-ap-02094 Doc 52-1 Filed 11/26/13 Entered 11/26/13 11:37:29 Desc Decomposition of George Michael Riley Sr. (November 4 2019) FOR GEORGE MICHAEL RILEY, SR. November 4, 2013

GEO	ORGE MICHAEL RILEY, SR.	-	•	November 4, 2013
		Page 61		Page 63
۱,	Liberty Oil, Florida?		1	A. I don't know.
1	A. I don't remember.		2	Q. Have you ever had a company called
2				Riley Properties?
3	Q. American Petroleum Group is listed.		3	· ·
4	I asked about that one earlier.		4	A. I don't know.
5	A. I don't know.		5	Q. What is Riley Mini Mart?
6	Q. So it's possible you had American		6	A. I don't know.
7	Petroleum Group?		7	Q. Have you ever had a company called
8	A. I don't know.		8	Riley Mini Mart?
9	Q. What is Riley		9	A. I don't know.
10	Chrysler/Plymouth/Dodge/Jeep?		10	Q. What is Riley Drive Thru?
11	A. I don't know.		11	A. I don't know.
12	Q. You've never had a company called		12	Q. Have you ever had a company called
13	Riley Chrysler/Plymouth/Dodge/Jeep?		13	Riley Drive Thru?
14	A. I don't remember.		14	A. I don't know.
15	Q. What is Belmont Petroleum?		15	Q. Dairy Marts listed in Ohio,
16	A. I don't know.		16	Pennsylvania, West Virginia, DC, Maryland,
17	Q. Have you ever had a company called		17	Kentucky, and Tennessee. Have you ever had any
18	Belmont Petroleum?		18	ownership interest in any Dairy Marts in those
19	A. I don't know. I don't remember.		19	states?
20	Q. What is Riley Auto Mart?		20	A. I don't know.
21	A. I don't know.		21	Q. What is Steel Valley Cab Company?
22	Q. Have you ever had a company called		22	A. I don't know.
23	Riley Auto Mart?		23	Q. Have you ever had any company called
24	A. I don't know.		24	Steel Valley Cab Company?
25	Q. What is Sun Rize Capitol (sic)?		25	A. I don't know.
25	Q. What is buil Rize Capitol (sie).			THE THORN THE PARTY OF THE PART
		Page 62		Page 64
	A. I don't know	Page 62	1	
1	A. I don't know.	Page 62	1	Q. What is Steel Valley Limousine
2	Q. Have you ever had a company called	Page 62	2	Q. What is Steel Valley Limousine Company?
2	Q. Have you ever had a company called Sun Rize Capitol?	Page 62	2 3	Q. What is Steel Valley Limousine Company? A. I don't know.
2 3 4	<ul><li>Q. Have you ever had a company called</li><li>Sun Rize Capitol?</li><li>A. I don't know.</li></ul>	Page 62	2 3 4	<ul><li>Q. What is Steel Valley Limousine</li><li>Company?</li><li>A. I don't know.</li><li>Q. Have you ever had any company called</li></ul>
2 3 4 5	<ul><li>Q. Have you ever had a company called</li><li>Sun Rize Capitol?</li><li>A. I don't know.</li><li>Q. What is Sun Rize Holding?</li></ul>	Page 62	2 3 4 5	<ul><li>Q. What is Steel Valley Limousine</li><li>Company?</li><li>A. I don't know.</li><li>Q. Have you ever had any company called</li><li>Steel Valley Limousine Company?</li></ul>
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	<ul> <li>Q. Have you ever had a company called Sun Rize Capitol?</li> <li>A. I don't know.</li> <li>Q. What is Sun Rize Holding?</li> <li>A. I don't know.</li> <li>Q. Have you ever had a company called Sun Rize Holding?</li> <li>A. I don't know.</li> <li>Q. What is Tri Star Holding?</li> <li>A. I don't know.</li> <li>Q. Have you ever had a company called Tri Star Holding?</li> <li>A. I don't know.</li> <li>Q. What is Palm Beach Properties?</li> <li>A. I don't know.</li> <li>Q. What is Palm Beach Properties?</li> <li>A. I don't know.</li> <li>Q. Have you ever had a company called Palm Beach Properties?</li> <li>A. I don't know.</li> <li>Q. What is M&amp;C Riley Properties?</li> <li>A. I don't know.</li> <li>Q. What is M&amp;C Riley Properties?</li> <li>A. I don't know.</li> </ul>	Page 62	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Q. What is Steel Valley Limousine Company? A. I don't know. Q. Have you ever had any company called Steel Valley Limousine Company? A. I don't know. Q. What is East Ohio Transfer? A. I don't know. Q. Have you ever had a company called East Ohio Transfer? A. I don't know. Q. What is Continental Industries? A. I don't know. Q. What is Continental Industries? A. I don't know. Q. Have you ever had a company called Continental Industries? A. I don't remember. Q. That's a different answer that you've been given me so far. Is there something different about that one? A. Oh, no. Q. Okay. Same. And the next one is
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	<ul> <li>Q. Have you ever had a company called Sun Rize Capitol?</li> <li>A. I don't know.</li> <li>Q. What is Sun Rize Holding?</li> <li>A. I don't know.</li> <li>Q. Have you ever had a company called Sun Rize Holding?</li> <li>A. I don't know.</li> <li>Q. What is Tri Star Holding?</li> <li>A. I don't know.</li> <li>Q. Have you ever had a company called Tri Star Holding?</li> <li>A. I don't know.</li> <li>Q. What is Palm Beach Properties?</li> <li>A. I don't know.</li> <li>Q. Have you ever had a company called Palm Beach Properties?</li> <li>A. I don't know.</li> <li>Q. Have you ever had a company called Palm Beach Properties?</li> <li>A. I don't know.</li> <li>Q. What is M&amp;C Riley Properties?</li> </ul>	Page 62	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Q. What is Steel Valley Limousine Company? A. I don't know. Q. Have you ever had any company called Steel Valley Limousine Company? A. I don't know. Q. What is East Ohio Transfer? A. I don't know. Q. Have you ever had a company called East Ohio Transfer? A. I don't know. Q. What is Continental Industries? A. I don't know. Q. What is Continental Industries? A. I don't know. Q. Have you ever had a company called Continental Industries? A. I don't remember. Q. That's a different answer that you've been given me so far. Is there something different about that one? A. Oh, no. Q. Okay. Same. And the next one is Mihajlo Enterprise. I asked you about that one
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	<ul> <li>Q. Have you ever had a company called Sun Rize Capitol?</li> <li>A. I don't know.</li> <li>Q. What is Sun Rize Holding?</li> <li>A. I don't know.</li> <li>Q. Have you ever had a company called Sun Rize Holding?</li> <li>A. I don't know.</li> <li>Q. What is Tri Star Holding?</li> <li>A. I don't know.</li> <li>Q. Have you ever had a company called Tri Star Holding?</li> <li>A. I don't know.</li> <li>Q. What is Palm Beach Properties?</li> <li>A. I don't know.</li> <li>Q. What is Palm Beach Properties?</li> <li>A. I don't know.</li> <li>Q. Have you ever had a company called Palm Beach Properties?</li> <li>A. I don't know.</li> <li>Q. What is M&amp;C Riley Properties?</li> <li>A. I don't know.</li> <li>Q. What is M&amp;C Riley Properties?</li> <li>A. I don't know.</li> </ul>	Page 62	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Q. What is Steel Valley Limousine Company? A. I don't know. Q. Have you ever had any company called Steel Valley Limousine Company? A. I don't know. Q. What is East Ohio Transfer? A. I don't know. Q. Have you ever had a company called East Ohio Transfer? A. I don't know. Q. What is Continental Industries? A. I don't know. Q. Have you ever had a company called Continental Industries? A. I don't remember. Q. Have you ever had a company called Continental Industries? A. I don't remember. Q. That's a different answer that you've been given me so far. Is there something different about that one? A. Oh, no. Q. Okay. Same. And the next one is Mihajlo Enterprise. I asked you about that one earlier too. What is Mihajlo Enterprise?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	<ul> <li>Q. Have you ever had a company called Sun Rize Capitol?</li> <li>A. I don't know.</li> <li>Q. What is Sun Rize Holding?</li> <li>A. I don't know.</li> <li>Q. Have you ever had a company called Sun Rize Holding?</li> <li>A. I don't know.</li> <li>Q. What is Tri Star Holding?</li> <li>A. I don't know.</li> <li>Q. Have you ever had a company called Tri Star Holding?</li> <li>A. I don't know.</li> <li>Q. What is Palm Beach Properties?</li> <li>A. I don't know.</li> <li>Q. What is Palm Beach Properties?</li> <li>A. I don't know.</li> <li>Q. Have you ever had a company called Palm Beach Properties?</li> <li>A. I don't know.</li> <li>Q. What is M&amp;C Riley Properties?</li> <li>A. I don't know.</li> <li>Q. What is M&amp;C Riley Properties?</li> <li>A. I don't know.</li> <li>Q. Have you ever had a company called</li> </ul>	Page 62	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q. What is Steel Valley Limousine Company? A. I don't know. Q. Have you ever had any company called Steel Valley Limousine Company? A. I don't know. Q. What is East Ohio Transfer? A. I don't know. Q. Have you ever had a company called East Ohio Transfer? A. I don't know. Q. What is Continental Industries? A. I don't know. Q. Have you ever had a company called Continental Industries? A. I don't remember. Q. That's a different answer that you've been given me so far. Is there something different about that one? A. Oh, no. Q. Okay. Same. And the next one is Mihajlo Enterprise. I asked you about that one earlier too. What is Mihajlo Enterprise? A. I don't know.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	<ul> <li>Q. Have you ever had a company called Sun Rize Capitol?</li> <li>A. I don't know.</li> <li>Q. What is Sun Rize Holding?</li> <li>A. I don't know.</li> <li>Q. Have you ever had a company called Sun Rize Holding?</li> <li>A. I don't know.</li> <li>Q. What is Tri Star Holding?</li> <li>A. I don't know.</li> <li>Q. Have you ever had a company called Tri Star Holding?</li> <li>A. I don't know.</li> <li>Q. What is Palm Beach Properties?</li> <li>A. I don't know.</li> <li>Q. Have you ever had a company called Palm Beach Properties?</li> <li>A. I don't know.</li> <li>Q. What is M&amp;C Riley Properties?</li> <li>A. I don't know.</li> <li>Q. What is M&amp;C Riley Properties?</li> <li>A. I don't know.</li> <li>Q. Have you ever had a company called M&amp;C Riley Properties?</li> </ul>	Page 62	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q. What is Steel Valley Limousine Company? A. I don't know. Q. Have you ever had any company called Steel Valley Limousine Company? A. I don't know. Q. What is East Ohio Transfer? A. I don't know. Q. Have you ever had a company called East Ohio Transfer? A. I don't know. Q. What is Continental Industries? A. I don't know. Q. Have you ever had a company called Continental Industries? A. I don't remember. Q. Have you ever had a company called Continental Industries? A. I don't remember. Q. That's a different answer that you've been given me so far. Is there something different about that one? A. Oh, no. Q. Okay. Same. And the next one is Mihajlo Enterprise. I asked you about that one earlier too. What is Mihajlo Enterprise?

Case 2:13-ap-02094 Doc 52-1 Filed 11/26/13 Entered 11/26/13 11:37:29 Desc Deposition Franks in the George Michael Riley Sr. (November 4 2019) EORGE MICHAEL RILEY, SR. November 4, 2013

GEL	ORGE MICHAEL RILEY, SR.	,	November 4, 2013
	Page 65		Page 67
1	Mihajlo Enterprise?	1	Q. Have you ever owned Riley Aviation
2	A. I don't remember.	2	Global?
3	Q. What is Riley Insurance Company, USA?	3	A. I don't remember.
4	A. I don't know.	4	Q. What is Jiffey Jon?
5	Q. Have you ever had any interest in	5	A. I don't know.
6	Riley Insurance Company, USA?	6	Q. Have you ever owned a business that
	A. I don't remember if I do.	7	was called Jiffey Jon?
7	Q. I've already asked you about American	8	A. I don't remember.
8	Aggregate Corp USA. Do you see that on there,	9	Q. Have you ever operated a business
9		10	called Jiffey Jon?
10	29?	11	A. I did.
11	A. I don't know.	12	Q. When did you operate it?
12	Q. Do you see that on there, number 29?	1	A. I don't remember.
13	A. Yes, I see 29.	13	
14	Q. And what is your relationship to	14	
15	American Aggregate Corporation?	15	
16	A. I don't know.	16	Q. Well, was it your business?
17	Q. Have you ever owned American	17	A. I don't know.
18	Aggregate Corporation?	18	Q. You just worked for it?
19	A. I don't know. I don't remember.	19	A. I don't know.
20	Q. What is American Steel Corporation?	20	Q. What is Sweet P Relief?
21	A. I don't know.	21	A. I don't know.
22	Q. Have you ever owned American Steel	22	Q. Have you ever owned or operated
23	Corporation?	23	Sweet P Relief?
24	A. I don't remember.	24	A. I don't remember.
25	Q. What is United Waste?	25	MR. BECKER: That's sweet with a
	Day 00	-	Page 68
	Page 66		
1	A. I don't know.	1	capital P, Relief, not spelled out.
2	Q. Have you ever owned a company called	2	Q. What is Royal Flush?
3	United Waste?	3	A. I don't know.
4	A. I don't remember.	4	Q. Have you ever owned or operated Royal
5	Q. What is Mobile Crushing & Screening?	5	Flush?
6	A. I don't know.	6	A. I don't remember.
7	Q. Have you ever owned a company called	7	Q. Black Diamond Demolition we've
8	Mobile Crushing & Screening?	8	already talked about. What is Buckeye
9	A. I don't remember.	9	Demolition?
10	Q. What is Florida Rock, Inc.?	10	A. I don't know.
11	A. I don't know.	11	Q. Have you ever owned or operated
12	Q. Have you ever owned a company called	12	Buckeye Demolition?
13	Florida Rock, Inc.?	13	A. I don't remember.
14	A. I don't know.	14	Q. What is Riley Leasing?
15	Q. What is O'Riley Pub?	15	A. I don't know.
16	A. I don't know.	16	Q. Have you ever owned or operated Riley
17	Q. Have you ever owned O'Riley Pub?	17	Leasing?
18	A. I don't remember.	18	A. I don't remember.
19	Q. What is Parrot Bay Yacht Club?	19	Q. What is Pay Day Express?
20	A. I don't know.	20	A. I don't know.
21	Q. Have you ever owned Parrot Bay Yacht	21	Q. Have you ever owned or operated
22	Club?	22	Pay Day Express?
23	A. I don't remember.	23	A. I don't remember.
24	Q. What is Riley Aviation Global?	24	Q. What is Riley Industrial Park?
25	A. I don't know.	25	A. I don't know.
	<del></del>		

GEC	ORGE MICHAEL RILEY, SR.		November 4, 2013
	Page 69		Page 71
1	Q. Have you ever owned or operated Riley	1	to designate and appoint as the agent and
2	Industrial Park?	2	lawful attorney for those companies that we
3	A. I don't remember.	3	just discussed your son?
4	Q. What is Some R Fun 1, Inc.?	4	A. I don't believe my signature is on
5	A. I don't know.	5	this.
6	Q. Have you ever owned or operated that	6	Q. That wasn't my question. My question
7	business?	7	is did you ever appoint him or did you attempt
8	A. I don't know.	8	to appoint your son as the agent for those
9	Q. Same question as to number 2 and 3,	9	companies?
10	Some R Fun, Inc.	10	A. Did not. My signature is not on
11	A. I don't remember.	11	here.
12	Q. Have you ever owned or operated those	12	Q. Did you ask somebody to prepare this
13	businesses?	13	document for you?
14	A. I don't remember.	14	A. Not to my knowledge.
15	Q. What is Fitzgerald Sanitation?	15	Q. Did you prepare the document?
16	A. I don't know.	16	A. I did not.
17	Q. Fitzgerald Sanitation is your buddy	17	Q. So you wouldn't have any idea where
18	Mr. Fitzgerald?	18	the names of these companies came from then?
19	A. He's my friend, Tom Fitzgerald.	19	A. I don't know.
20	Q. Yes.	20	MR. BECKER: Well, let's mark this
21	A. His last name is not sanitation.	21	one.
22	Q. Does he have a company called	22	(Plaintiff's Exhibit Number 19 was
23	Fitzgerald Sanitation?	23	marked for identification.)
24	A. He may. I'm not Tom.	24	Q. I'm handing you what has been marked
25	Q. Did you own or operate it?	25	as Exhibit 19. That's a settlement agreement
		-	D 70
	Page 70		Page 72
1	A. I did.	1	that you and your company entered into in this
2	Q. What did you do with it?	2	case. If you turn to the back of it, sir,
3	A. I don't remember.	3	where the signature lines begin, it's on the
4	Q. When did you own or operate it?	4	second to last and last page, you signed as
5	A. I don't know.	5	president for United Waste Services, Inc.;
6	Q. Which was it, did you own it or did	6	correct?
7	you operate it?	7	A. Okay.
8	A. I don't know.	8	Q. And you signed as president of
9	Q. What is Auto Recycling, Ohio?	9	American Aggregates Corporation, USA?
10	A. I don't know.	10	A. Okay.
11	Q. Did you ever own or operate Auto	11	Q. You signed as Ireland Equipment
12	~ " 0110		C IIC A 1 4 40
	Recycling, Ohio?	12	Company USA, president, correct?
13	A. No. Or I don't know.	13	A. Okay.
14	<ul><li>A. No. Or I don't know.</li><li>Q. What is Riley Aviation Holdings</li></ul>	13 14	<ul><li>A. Okay.</li><li>Q. You signed as the president of</li></ul>
14 15	<ul><li>A. No. Or I don't know.</li><li>Q. What is Riley Aviation Holdings</li><li>Global?</li></ul>	13 14 15	<ul><li>A. Okay.</li><li>Q. You signed as the president of</li><li>Fitzgerald Sanitation, correct?</li></ul>
14 15 16	<ul><li>A. No. Or I don't know.</li><li>Q. What is Riley Aviation Holdings</li><li>Global?</li><li>A. I don't know.</li></ul>	13 14 15 16	<ul><li>A. Okay.</li><li>Q. You signed as the president of</li><li>Fitzgerald Sanitation, correct?</li><li>A. Okay.</li></ul>
14 15 16 17	<ul> <li>A. No. Or I don't know.</li> <li>Q. What is Riley Aviation Holdings</li> <li>Global?</li> <li>A. I don't know.</li> <li>Q. Did you ever own or operate Riley</li> </ul>	13 14 15 16 17	<ul> <li>A. Okay.</li> <li>Q. You signed as the president of</li> <li>Fitzgerald Sanitation, correct?</li> <li>A. Okay.</li> <li>Q. You signed as president of Jiffey Jon</li> </ul>
14 15 16 17 18	<ul> <li>A. No. Or I don't know.</li> <li>Q. What is Riley Aviation Holdings</li> <li>Global?</li> <li>A. I don't know.</li> <li>Q. Did you ever own or operate Riley</li> <li>Aviation Holdings Global?</li> </ul>	13 14 15 16 17 18	<ul> <li>A. Okay.</li> <li>Q. You signed as the president of</li> <li>Fitzgerald Sanitation, correct?</li> <li>A. Okay.</li> <li>Q. You signed as president of Jiffey Jon</li> <li>Portable Toilet, correct?</li> </ul>
14 15 16 17 18 19	<ul> <li>A. No. Or I don't know.</li> <li>Q. What is Riley Aviation Holdings</li> <li>Global?</li> <li>A. I don't know.</li> <li>Q. Did you ever own or operate Riley</li> <li>Aviation Holdings Global?</li> <li>A. I don't know. I don't remember.</li> </ul>	13 14 15 16 17 18 19	<ul> <li>A. Okay.</li> <li>Q. You signed as the president of</li> <li>Fitzgerald Sanitation, correct?</li> <li>A. Okay.</li> <li>Q. You signed as president of Jiffey Jon</li> <li>Portable Toilet, correct?</li> <li>A. Okay.</li> </ul>
14 15 16 17 18 19 20	<ul> <li>A. No. Or I don't know.</li> <li>Q. What is Riley Aviation Holdings</li> <li>Global?</li> <li>A. I don't know.</li> <li>Q. Did you ever own or operate Riley</li> <li>Aviation Holdings Global?</li> <li>A. I don't know. I don't remember.</li> <li>Q. What is Riley Development USA?</li> </ul>	13 14 15 16 17 18 19 20	<ul> <li>A. Okay.</li> <li>Q. You signed as the president of</li> <li>Fitzgerald Sanitation, correct?</li> <li>A. Okay.</li> <li>Q. You signed as president of Jiffey Jon</li> <li>Portable Toilet, correct?</li> <li>A. Okay.</li> <li>Q. You signed as president of</li> </ul>
14 15 16 17 18 19 20 21	<ul> <li>A. No. Or I don't know.</li> <li>Q. What is Riley Aviation Holdings</li> <li>Global?</li> <li>A. I don't know.</li> <li>Q. Did you ever own or operate Riley</li> <li>Aviation Holdings Global?</li> <li>A. I don't know. I don't remember.</li> <li>Q. What is Riley Development USA?</li> <li>A. I don't know.</li> </ul>	13 14 15 16 17 18 19 20 21	<ul> <li>A. Okay.</li> <li>Q. You signed as the president of</li> <li>Fitzgerald Sanitation, correct?</li> <li>A. Okay.</li> <li>Q. You signed as president of Jiffey Jon</li> <li>Portable Toilet, correct?</li> <li>A. Okay.</li> <li>Q. You signed as president of</li> <li>Continental Industries, Inc.?</li> </ul>
14 15 16 17 18 19 20 21	<ul> <li>A. No. Or I don't know.</li> <li>Q. What is Riley Aviation Holdings</li> <li>Global?</li> <li>A. I don't know.</li> <li>Q. Did you ever own or operate Riley</li> <li>Aviation Holdings Global?</li> <li>A. I don't know. I don't remember.</li> <li>Q. What is Riley Development USA?</li> <li>A. I don't know.</li> <li>Q. Did you ever own or operate Riley</li> </ul>	13 14 15 16 17 18 19 20 21 22	<ul> <li>A. Okay.</li> <li>Q. You signed as the president of</li> <li>Fitzgerald Sanitation, correct?</li> <li>A. Okay.</li> <li>Q. You signed as president of Jiffey Jon</li> <li>Portable Toilet, correct?</li> <li>A. Okay.</li> <li>Q. You signed as president of</li> <li>Continental Industries, Inc.?</li> <li>A. Okay.</li> <li>A. Okay.</li> </ul>
14 15 16 17 18 19 20 21 22 23	<ul> <li>A. No. Or I don't know.</li> <li>Q. What is Riley Aviation Holdings</li> <li>Global?</li> <li>A. I don't know.</li> <li>Q. Did you ever own or operate Riley</li> <li>Aviation Holdings Global?</li> <li>A. I don't know. I don't remember.</li> <li>Q. What is Riley Development USA?</li> <li>A. I don't know.</li> <li>Q. Did you ever own or operate Riley</li> <li>Development USA?</li> </ul>	13 14 15 16 17 18 19 20 21 22 23	<ul> <li>A. Okay.</li> <li>Q. You signed as the president of</li> <li>Fitzgerald Sanitation, correct?</li> <li>A. Okay.</li> <li>Q. You signed as president of Jiffey Jon</li> <li>Portable Toilet, correct?</li> <li>A. Okay.</li> <li>Q. You signed as president of</li> <li>Continental Industries, Inc.?</li> <li>A. Okay.</li> <li>Q. You signed as president of R&amp;F</li> </ul>
14 15 16 17 18 19 20 21 22 23 24	<ul> <li>A. No. Or I don't know.</li> <li>Q. What is Riley Aviation Holdings</li> <li>Global?</li> <li>A. I don't know.</li> <li>Q. Did you ever own or operate Riley</li> <li>Aviation Holdings Global?</li> <li>A. I don't know. I don't remember.</li> <li>Q. What is Riley Development USA?</li> <li>A. I don't know.</li> <li>Q. Did you ever own or operate Riley</li> <li>Development USA?</li> <li>A. I don't remember.</li> </ul>	13 14 15 16 17 18 19 20 21 22 23 24	<ul> <li>A. Okay.</li> <li>Q. You signed as the president of</li> <li>Fitzgerald Sanitation, correct?</li> <li>A. Okay.</li> <li>Q. You signed as president of Jiffey Jon</li> <li>Portable Toilet, correct?</li> <li>A. Okay.</li> <li>Q. You signed as president of</li> <li>Continental Industries, Inc.?</li> <li>A. Okay.</li> <li>Q. You signed as president of R&amp;F</li> <li>Company of Lansing, correct?</li> </ul>
14 15 16 17 18 19 20 21 22 23	<ul> <li>A. No. Or I don't know.</li> <li>Q. What is Riley Aviation Holdings</li> <li>Global?</li> <li>A. I don't know.</li> <li>Q. Did you ever own or operate Riley</li> <li>Aviation Holdings Global?</li> <li>A. I don't know. I don't remember.</li> <li>Q. What is Riley Development USA?</li> <li>A. I don't know.</li> <li>Q. Did you ever own or operate Riley</li> <li>Development USA?</li> </ul>	13 14 15 16 17 18 19 20 21 22 23	<ul> <li>A. Okay.</li> <li>Q. You signed as the president of</li> <li>Fitzgerald Sanitation, correct?</li> <li>A. Okay.</li> <li>Q. You signed as president of Jiffey Jon</li> <li>Portable Toilet, correct?</li> <li>A. Okay.</li> <li>Q. You signed as president of</li> <li>Continental Industries, Inc.?</li> <li>A. Okay.</li> <li>Q. You signed as president of R&amp;F</li> </ul>

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ĠEG	DRGE MICHAEL RILEY, SR.		November 4, 201
	Page 73		Page 7
	Q. You signed as president of Eagle	1	A. Okay.
1	Industries of Columbus, correct?	2	Q. This was a statement of your
2	A. Okay.	3	financial affairs, and it was supposed to list
3	Q. None of those companies are listed on	4	the income from employment or operation of
4	your bankruptcy petition, correct?	5	business that you had, and the only thing you
5	A. I don't know.	6	listed was \$13,000 in 2012 from self-employment
6	Q. Well, it's in front of you. It's	7	income, correct?
	exhibit that one there. 15. Turn to page	8	A. Yes. Yes.
8	27 of 36. At the very top it will tell you	9	Q. In 2011 all you listed was \$6,000
9 10	which page you are at. (Indicating.)	10	from self-employment income, correct?
11	A. What was it again?	11	MR. GUNNER: You had 20. There's 22.
12	Q. 27 of 36. Question 18 of your filing	12	THE WITNESS: Okay.
13	that you swore was accurate under oath	13	Q. You didn't list any of the income
14	indicates that if you were if you are an	14	that you derived from Ohio Rock, correct?
15	individual, you were supposed to list the	15	A. I don't understand what you are
16	names, addresses, taxpayer identification	16	saying.
17	numbers, nature of the businesses, and the	17	Q. Well, there's nothing listed here to
18	beginning and ending date of all businesses in	18	indicate that you received any income from Ohio
19	which the debtor was an officer, director,	19	Rock, correct?
20	partner, or managing executive of a	20	A. I don't know.
21	corporation, partner in a partnership, sole	21	Q. Sir, it says that your only source of
22	proprietor, or was self employed in a trade,	22	income in 2012 and 2011 was self employment?
23	profession, or other activity either full or	23	A. That's correct. I worked for myself.
24	part-time within six years immediately	24	Q. And yet you were performing services
25	preceding the commencement of this case nor	25	for Ohio Rock, you were their manager, then you
	Page 74		Page 7
1	which the debtor owned five percent or more of	1	were designated as the person most
	Willott the debter o who a fire personal or and a	} <u> </u>	were designated as the person most
	the voting or equity securities within six	2	
2	the voting or equity securities within six	1	knowledgeable and as the manager of Ohio Rock
2	the voting or equity securities within six years immediately preceding the commencement of	2	
2 3 4	the voting or equity securities within six years immediately preceding the commencement of this case.	2 3	knowledgeable and as the manager of Ohio Rock during our last deposition, correct?  A. Okay.  Q. You didn't list Ohio Rock as being
2 3 4 5	the voting or equity securities within six years immediately preceding the commencement of this case.  Your filing was made on December 14,	2 3 4	knowledgeable and as the manager of Ohio Rock during our last deposition, correct?  A. Okay.
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2 3 4 5 6 7 8	the voting or equity securities within six years immediately preceding the commencement of this case.  Your filing was made on December 14, 2012. The only entities that you list there are United Waste Services, Inc., Mikate Company, Inc., and Residential Commercial and	2 3 4 5 6 7 8	knowledgeable and as the manager of Ohio Rock during our last deposition, correct?  A. Okay.  Q. You didn't list Ohio Rock as being one of the sources of your income for either 2012 or 2011, correct?  A. I'm not an owner.  Q. That wasn't my question. You didn't list any income from them?
2 3 4 5 6 7 8 9	the voting or equity securities within six years immediately preceding the commencement of this case.  Your filing was made on December 14, 2012. The only entities that you list there are United Waste Services, Inc., Mikate Company, Inc., and Residential Commercial and Industrial Services; correct?	2 3 4 5 6 7 8 9 10	knowledgeable and as the manager of Ohio Rock during our last deposition, correct?  A. Okay.  Q. You didn't list Ohio Rock as being one of the sources of your income for either 2012 or 2011, correct?  A. I'm not an owner.  Q. That wasn't my question. You didn't list any income from them?  A. Okay.
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2 3 4 5 6 7 8 9 10 11	the voting or equity securities within six years immediately preceding the commencement of this case. Your filing was made on December 14, 2012. The only entities that you list there are United Waste Services, Inc., Mikate Company, Inc., and Residential Commercial and Industrial Services; correct? A. If that's what Q. That's what it says, right? A. Okay. Q. You didn't list any of the companies that you signed as the president of on your	2 3 4 5 6 7 8 9 10 11 12 13	knowledgeable and as the manager of Ohio Rock during our last deposition, correct?  A. Okay.  Q. You didn't list Ohio Rock as being one of the sources of your income for either 2012 or 2011, correct?  A. I'm not an owner.  Q. That wasn't my question. You didn't list any income from them?  A. Okay.  Q. Why not?  A. I don't know. Don't you have to get money?
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	the voting or equity securities within six years immediately preceding the commencement of this case.  Your filing was made on December 14, 2012. The only entities that you list there are United Waste Services, Inc., Mikate Company, Inc., and Residential Commercial and Industrial Services; correct?  A. If that's what Q. That's what it says, right? A. Okay. Q. You didn't list any of the companies that you signed as the president of on your settlement agreement, which we marked as Exhibit 19, correct, other than United Waste,	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	knowledgeable and as the manager of Ohio Rock during our last deposition, correct?  A. Okay.  Q. You didn't list Ohio Rock as being one of the sources of your income for either 2012 or 2011, correct?  A. I'm not an owner.  Q. That wasn't my question. You didn't list any income from them?  A. Okay.  Q. Why not?  A. I don't know. Don't you have to get money?  Q. Are you telling me you didn't get any income from Ohio Rock in 2012?
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	the voting or equity securities within six years immediately preceding the commencement of this case.  Your filing was made on December 14, 2012. The only entities that you list there are United Waste Services, Inc., Mikate Company, Inc., and Residential Commercial and Industrial Services; correct?  A. If that's what Q. That's what it says, right? A. Okay. Q. You didn't list any of the companies that you signed as the president of on your settlement agreement, which we marked as Exhibit 19, correct, other than United Waste, correct?  A. If that's what it says. Q. Yet you swore this was true when you filed it under oath, correct? A. To the best of my knowledge, yes. Q. If you turn to page 22 of that	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	knowledgeable and as the manager of Ohio Rock during our last deposition, correct?  A. Okay.  Q. You didn't list Ohio Rock as being one of the sources of your income for either 2012 or 2011, correct?  A. I'm not an owner.  Q. That wasn't my question. You didn't list any income from them?  A. Okay.  Q. Why not?  A. I don't know. Don't you have to get money?  Q. Are you telling me you didn't get any income from Ohio Rock in 2012?  A. I'm not saying that.  Q. If you got income from 2012 from Ohio Rock, then you did not list it on your bankruptcy filing, correct?  A. It's right here. (Indicating.)  Q. Where?

ĠEŒ	ORGE MICHAEL RILEY, SR.	`	November 4, 2013
	Page 77		Page 79
1	A. If I cut your grass, I should list	1	Ohio Rock. Who is Gail Grimes?
2	your name on here too?	2	A. I don't know. I don't know. I don't
3	Q. You stated under oath that you were	3	remember.
4	the manager of Ohio Rock. You controlled their	4	Q. Never met her?
5	bank account. You testified at the last	5	A. I don't remember.
6	deposition that you used their bank account for	6	Q. Where does she live?
7	anything that you needed. Are you telling me	7	A. I don't know.
8	that's not income to you?	8	Q. Does she still work for Ohio Rock?
9	A. Depends on what you consider income.	9	A. I don't know.
10	Q. Are you testifying here today, sir,	10	Q. You are the manager of Ohio Rock?
11	that you received no income from Ohio Rock in	11	A. I don't know.
12	2012?	12	Q. What is Terra Demolition, LLC, T E R
13	A. I'm testifying I don't know.	13	R A?
14	Q. You told me that you're paying your	14	A. I don't know.
15	rent with cash, correct?	15	Q. What is at 101 North Zane, Z A N E,
16	A. Yes.	16	in Martins Ferry, Ohio?
17	Q. Where do you get the money to pay	17	A. I don't know.
18	your rent?	18	Q. You've never operated Terra
19	A. Wherever I work.	19	Demolition, LLC?
20	Q. Where are you working?	20	A. I don't remember.
21	A. All over.	21	Q. Are you an owner of Terra Demolition,
22	Q. Tell me where you've worked in the	22	LLC?
23	last month.	23	A. I don't know.
24	A. I don't remember.	24	Q. What companies have you participated
25	Q. What records do you have to indicate	25	in forming since you were released from prison?
	Page 78		Page 80
	-		•
1	you've worked in the last month?	1	A. I don't understand what you are
2	A. I don't know.	2	saying.
3	Q. What do you do with the money you	3	Q. Well, since you got out of jail, have
4	receive?	4	you participated in putting together any
5	A. Put it in my pocket.	5	businesses?
6	Q. You have no bank account?	6	A. I don't know.
7	A. No.	7	Q. Who have you participated with in
8	Q. Do you get paid in cash or checks?	8	forming those businesses? What lawyers have
9	A. Either or. I'll go to their bank and	9	you used?
10	cash it.	10	A. I didn't know that I did.
11	Q. Who have you worked for in the last	11	Q. You just testified that you don't
12	month?	12	know whether you did, which means you don't
13	A. I don't remember.	13	deny it. So which lawyers have you used to
14	Q. What documents do you keep to	14	form any businesses since you've been released
15	indicate who you worked for?	15	from prison?
16	A. I didn't know I had to keep any.	16	A. I don't remember.
17	Q. Do you have any documents to indicate	17	MR. BECKER: Let's go ahead and mark
18	where you've worked in the last month?	18	these. I don't have copies, but we will make
19	A. I don't know.	19	copies with the depo.
20	MR. BECKER: Let's take a break.	20	(Plaintiff's Exhibit Number 20 was
21	(A brief recess was taken.)	21	marked for identification.)
22	Q. Who is Gail Grimes?	22	Q. We've marked as Plaintiff's Exhibit
23	A. I don't know.	23	20 the Articles of Organization, which we
24	Q. She's listed as the secretary of Ohio	24	discussed earlier in the deposition, for the
25	Rock on Exhibit 12. You are the manager of	25	Florida limited liability company, Black
		1	

GE	ORGE MICHAEL RILEY, SR.	_	November 4, 201
	Page 81		Page 83
1	Diamond Demolition Limited, which lists you as	1	Sanitation in Hebron, Ohio, A1 Jiffey Jon. Did
2	the statutory agent, correct? Is that your	2	you sell those businesses on behalf of Ireland
3	name at the bottom? It says George Riley?	3	Equipment Company?
4	A. It says George Riley, but I'm not the	4	A. I don't remember.
5	only George Riley in America.	5	Q. Who is Bill Reynolds?
6	Q. Are you now denying or admitting that	6	A. I don't know.
7	you were the statutory agent for Black Diamond?	7	Q. He's the one that bought those
8	A. I don't know.	8	businesses from you, correct?
9	(Plaintiff's Exhibit Number 21 was	9	A. I don't know. I don't remember.
10	marked for identification.)	10	Q. So you don't deny it, you just don't
11	Q. I'll mark as Exhibit 21 the Articles	11	remember?
12	of Organization of 1221 Palm Harbor, LLC.	12	A. I gave you my answer.
13	We've discussed this earlier in the	13	Q. What is the next job that you have
14	deposition. Do you still take the position	14	lined up to perform?
15	that you have no relationship or business	15	<ul><li>A. Anything that comes along the road.</li><li>Q. Well, what is the next one you have</li></ul>
16	dealings with Palm Harbor, LLC?	16	Q. Well, what is the next one you have lined up to do? Do you have anything
17	A. I don't see my name on here.	17 18	scheduled?
18	<ul><li>Q. That wasn't my question.</li><li>A. I don't know.</li></ul>	19	A. Nothing scheduled.
19	(Plaintiff's Exhibit Number 22 was	20	Q. When is the last time you did a job?
20	marked for identification.)	21	A. I don't remember.
22	Q. We've marked as Plaintiff's Exhibit	22	Q. Yesterday?
23	22 a copy of an Asset Purchase Agreement dated	23	A. I don't remember.
24	March 14, 2006, where you are listed as the	24	Q. Did you work last week?
25	seller. Do you see that?	25	A. I don't remember.
	•		
	Page 82		Page 84
1	A. I see it.	1	Q. When was the last time you were paid?
2	Q. Are those your signatures on the	2	A. I don't remember.
3	second and third pages?	3	Q. Do you still have a Verizon Wireless
4	A. I don't know.	4	account?
5	Q. You don't deny that they are,	5	A. I don't know. I didn't know I had
6	correct?	6	one.
7	A. Doesn't look like it too well, but	7	Q. Well, you were paying bills to a
8	Q. Did you sell those businesses?	8	wireless A. Are you talking Mike Riley or Ohio
9	A. I don't know if I don't remember.	9	A. Are you talking Mike Riley or Ohio Rock?
10	<ul><li>Q. So you don't deny it? Sir?</li><li>A. I don't remember.</li></ul>	10	Q. Ohio Rock.
11		12	A. I'm speaking I can't speak on
12	Q. So you don't deny it'?  A. I don't remember.	13	behalf of Ohio Rock. Their counsel is not
14	MR. BECKER: When you have a chance,	14	here.
15	I'd like to get that back for clarification.	15	Q. So you were
16	MR. GUNNER: Sure. I'm putting stuff	16	A. I can't answer any questions on
17	here that I want copies of.	17	behalf of Ohio Rock without their counsel.
18	Q. You were referring to Plaintiff's	18	MR. GUNNER: You can answer questions
19	Exhibit 22. It's an Asset Purchase Agreement	19	with respect to what you did. If it's
20	between Ireland Equipment, Inc., which Michael	20	something you don't know, you can relate that
21	Riley listed as being the seller on March 14,	21	to him, if you don't know.
22	2006, and it was purporting to sell companies	22	THE WITNESS: Okay.
23	doing business as A1 Portable Toilets in Mount	23	Q. Bank records that were produced by
24	Vernon, Ohio, Sweet Pee, that's P E E, Portable	24	Ohio Rock, which you testified you controlled,
25	Toilet, Chillicothe, Ohio, and Fitzgerald	25	indicate that you made a Verizon Wireless

	TRGE WITCHAEL KILET, SK.		1,0,0,0,0,0,0
	Page 85		Page 87
1	payment of \$215.92 on April 30, 2012. So my	1	A. What is that?
2	question is, do you still have that Verizon	2	Q. There's a charge on October 22, 2012,
	Wireless account?	3	in the amount of \$279.48. Did you go there?
3	A. I don't remember.	4	A. I don't know.
4	Q. Those records indicate that you made	5	Q. Do you have an account with Apple
5	a payment to the Artisan Truck Insurance for a	6	iTunes store?
6	premium payment. What truck did that relate	7	A. Where?
7		8	Q. Do you have any accounts with any
8	to? A. I don't know.	9	Apple iTunes store?
9		10	A. I don't know where the Apple iTune
10	Q. Was it a truck that you owned?	1	is.
11	A. I don't own no trucks.	11	Q. There's a check card purchase on
12	Q. So it was a truck that Ohio Rock	12	October 19, 2012, for Apple iTunes store.
13	owned?	13	A. I don't remember.
14	A. I can't speak on behalf of Ohio Rock.	14	
15	Q. If you have knowledge of it, you can.	15	Q. Were those for you?
16	A. I don't have the knowledge. I don't	16	A. I don't know.
17	know.	17	Q. Do you have a Time Warner Cable
18	Q. Where did you fly on U.S. Air in	18	account?
19	March of 2012 or April of 2012?	19	A. I don't know.
20	A. I don't believe I flew anywhere.	20	Q. Well, in the place where you are
21	Q. Ohio Rock through you purchased a	21	living on Moull Street, do you have cable
22	U.S. Airway ticket on March 14, 2012, for	22	service?
23	\$474.20.	23	A. Not no more.
24	A. I don't know. I don't remember.	24	Q. When was the last time you had it?
25	Q. You were the manager. Who did you	25	A. I don't know.
	Dogo 96		Page 88
	Page 86		Page 88
1	fly?	1	Q. You used to have one?
1 2	fly? A. I don't remember.	1 2	<ul><li>Q. You used to have one?</li><li>A. I don't know. I don't remember.</li></ul>
1	fly? A. I don't remember. Q. Do you have an account with the		<ul><li>Q. You used to have one?</li><li>A. I don't know. I don't remember.</li><li>Q. There's a check card purchase made on</li></ul>
2	fly? A. I don't remember.	2	<ul> <li>Q. You used to have one?</li> <li>A. I don't know. I don't remember.</li> <li>Q. There's a check card purchase made on</li> <li>October 17, 2012, Time Warner Cable. Was that</li> </ul>
2	fly? A. I don't remember. Q. Do you have an account with the	2 3	<ul> <li>Q. You used to have one?</li> <li>A. I don't know. I don't remember.</li> <li>Q. There's a check card purchase made on</li> <li>October 17, 2012, Time Warner Cable. Was that</li> <li>for your apartment on Moull Street?</li> </ul>
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	ORGE MICHAEL RILEY, SR.	,	November 4, 2013
	Page 89		Page 91
1	A. What radio?	1	A. I don't know.
2	Q. In any of your vehicles.	2	Q. Is the Natural Remedy Spa at that
3	A. I don't have any vehicles.	3	hotel?
4	Q. Any of the vehicles you drive have	4	A. I have no idea.
5	Sirius FM accounts?	5	Q. Is that for your personal benefit?
6	A. I don't know.	6	A. I don't know. I don't remember.
7	Q. There's a charge here on October 9,	7	Q. Do you have an account at match.com?
8	2012, it's a recurring check charge for the	8	A. What is it?
9	Sirius account?	9	Q. Match.com.
10	A. I don't know.	10	A. I don't know.
11	Q. Were you making that payment for your	11	Q. So if there was a charge on
12	personal benefit?	12	9/27/2012, that would have been for your
13	A. I don't know.	13	benefit?
14	Q. So	14	A. I don't know.
15	A. If I even made it, I don't know. I	15	Q. Ohio Rock doesn't have any need for
16	don't remember.	16	an account with match.com, correct?
	Q. Where is TLF Parkway Florist?	17	A. I don't know. Does it say I did it?
17 18	A. I don't know.	18	Q. Were you also at the Blennerhassett
	Q. Did you make a purchase on October 5,	19	Hotel on September 26, 2012?
19	2012, from Parkway Florist?	20	A. Does it say I was there?
20		21	Q. Sir, were you there or not?
21		22	A. I don't remember.
22		23	Q. What is Martins Ferry's Starfire?
23		24	A. I don't know.
24	<ul><li>Q. It says check card purchase.</li><li>A. I don't know.</li></ul>	25	Q. Did you make a purchase at Bath &
25	A. I don't know.	25	Q. Did you make a paremase at Bath &
	Page 90		Page 92
1_		1	Body Works using the Ohio Rock account for your
1	Q. Is that for your own personal	2	personal benefit on August 6, 2012?
2	benefit?  A. I don't remember.	4	
1		9	
3		3	A. I don't know.
3 4	Q. So you don't deny it, correct?	4	A. I don't know. Q. So you don't deny it, correct?
3 4 5	Q. So you don't deny it, correct? Correct?	4 5	A. I don't know. Q. So you don't deny it, correct? Correct?
3 4 5 6	<ul><li>Q. So you don't deny it, correct?</li><li>Correct?</li><li>A. I don't remember.</li></ul>	4 5 6	A. I don't know. Q. So you don't deny it, correct? Correct? A. I don't remember.
3 4 5 6 7	<ul><li>Q. So you don't deny it, correct?</li><li>Correct?</li><li>A. I don't remember.</li><li>Q. Where is Natural Remedies Spa?</li></ul>	4 5 6 7	<ul> <li>A. I don't know.</li> <li>Q. So you don't deny it, correct?</li> <li>Correct?</li> <li>A. I don't remember.</li> <li>Q. Have you visited Tan Pro and</li> </ul>
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3 4 5 6 7 8 9	<ul> <li>Q. So you don't deny it, correct?</li> <li>Correct?</li> <li>A. I don't remember.</li> <li>Q. Where is Natural Remedies Spa?</li> <li>A. I don't know.</li> <li>Q. Did you make purchases at the Natural</li> </ul>	4 5 6 7 8 9	<ul> <li>A. I don't know.</li> <li>Q. So you don't deny it, correct?</li> <li>Correct?</li> <li>A. I don't remember.</li> <li>Q. Have you visited Tan Pro and purchased items with your Ohio Rock account?</li> <li>A. I don't know.</li> </ul>
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3 4 5 6 7 8 9 10 11 12 13 14	<ul> <li>Q. So you don't deny it, correct?</li> <li>Correct?</li> <li>A. I don't remember.</li> <li>Q. Where is Natural Remedies Spa?</li> <li>A. I don't know.</li> <li>Q. Did you make purchases at the Natural Remedies Spa in October of 2012?</li> <li>A. I don't remember.</li> <li>Q. Did you stay at the Natural Remedies well, did you receive services at the Natural Remedies Spa, October of 2012?</li> </ul>	4 5 6 7 8 9 10 11 12 13	A. I don't know. Q. So you don't deny it, correct? Correct? A. I don't remember. Q. Have you visited Tan Pro and purchased items with your Ohio Rock account? A. I don't know. Q. So you don't deny it? A. Does it say I did? Was it me that went? Q. Did you purchase it for somebody else?
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3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	<ul> <li>Q. So you don't deny it, correct?</li> <li>Correct?</li> <li>A. I don't remember.</li> <li>Q. Where is Natural Remedies Spa?</li> <li>A. I don't know.</li> <li>Q. Did you make purchases at the Natural Remedies Spa in October of 2012?</li> <li>A. I don't remember.</li> <li>Q. Did you stay at the Natural Remedies well, did you receive services at the Natural Remedies Spa, October of 2012?</li> <li>A. Where is it at?</li> <li>Q. There's a check card purchase on 10/1/2012.</li> <li>A. I don't know where it is. I don't remember.</li> <li>Q. Did you stay at the I'm going to have to spell it, B L E N N E R H A S S E T Hotel on the same day, October 1?</li> <li>A. I don't know what that means. You</li> </ul>	4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A. I don't know. Q. So you don't deny it, correct? Correct? A. I don't remember. Q. Have you visited Tan Pro and purchased items with your Ohio Rock account? A. I don't know. Q. So you don't deny it? A. Does it say I did? Was it me that went? Q. Did you purchase it for somebody else? A. I don't remember. Q. Did you make a purchase for yourself from godaddy.com on January of 2013? A. I don't remember. Q. So you don't deny it, correct? A. I don't remember. Q. Do you have Onstar in any of the vehicles that you operate? A. Do I have what?

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	ORGE MICHAEL RILEY, SR.			November 4,	
	Page 9	3		Pag	ge 95
1	Q. Do any of the vehicles that you were	1	A.	I don't remember.	
2	operating for Ohio Rock have Onstar?	2	Q.	Who does he live there with?	
3	A. I don't know.	3	Ä.	I don't know.	
4	Q. Did you make purchases for your	4	Q.	Is he married?	
5	personal use at T.J. Maxx in January of 2013	5	À.	I don't know.	
6	using the Ohio Rock account?	6	Q.	Does he have any kids?	
7	A. What's T.J. Maxx?	7	À.	Yes.	
8	Q. Did you or did you not?	8	Q.	How many kids does he have?	
9	A. I don't know what it is, so I don't	9	À.	Two.	
10	know.	10	Q.	Do they live there with him?	
L1	Q. What sources of income have you had	11	-	I don't know.	
L2	in the last month?	12	Q.	Have you received any income from	
L 3	A. Whatever I could get.	13		son in the last month?	
L4	Q. Where have they come from?	14	A.	No.	
L 5	A. All over.	15	Q.	In the last six months?	
L 6	Q. Where?	16	A.	No.	
L 7	A. Hauling scrap, whatever.	17	Q.	Have you provided your son with any	
L /	Q. Give me one example.	18		me or assets in the last six months?	
L 9	A. I don't remember.	19	A.	No.	
20	Q. What are you using to haul the scrap?	20	Q.	Where does your son live?	
21	A. My brother's pickup, if I can.	21		Newark.	
22	Q. What kind of pickup is that?	22	Q.	Where in Newark?	
	A. It's his.	23		I don't know his address.	
23	Q. What kind?	24		You don't know your son's address?	
24 25	A. Blue one.	25	A.	I don't know his address.	
23	A. Blue one.				
-,	Page 9	)4		Pa	ge 96
1	Q. What year and what make?	1	Q.	Does he live in an apartment or a	
2	A. I don't know.	2	hous	e?	
3	Q. Where do you haul the scrap to?	3	A.	A house.	
4	A. Sometimes he buys it from me.	4	Q.	What street?	
5	Q. What kind of scrap?	5	À.	I don't know.	
6	A. Scrap metal.	6	Q.	How do you go visit him?	
7	Q. Does he own a business?	7	À.	THE RESERVE OF THE PARTY OF THE	
8	A. Excuse me?	8	Q.	Have you been to his house?	
9		- 1			
	O Does he have a business?	9	-	I have.	
	Q. Does he have a business?  A Lean't answer for him. You would	9 10	A.		
LO	A. I can't answer for him. You would	10	A. Q.	How do you know where to go?	
L0 L1	A. I can't answer for him. You would have to ask him.	10 11	A. Q. A.	How do you know where to go? Because I know how to get there.	
LO L1 L2	<ul><li>A. I can't answer for him. You would have to ask him.</li><li>Q. Why does he buy your scrap?</li></ul>	10 11 12	A. Q. A. Q.	How do you know where to go? Because I know how to get there. What's it next to?	
10 11 12 13	<ul><li>A. I can't answer for him. You would have to ask him.</li><li>Q. Why does he buy your scrap?</li><li>A. You'd have to ask him.</li></ul>	10 11 12 13	A. Q. A. Q. A.	How do you know where to go? Because I know how to get there. What's it next to? Excuse me?	
10 11 12 13	<ul> <li>A. I can't answer for him. You would have to ask him.</li> <li>Q. Why does he buy your scrap?</li> <li>A. You'd have to ask him.</li> <li>Q. Do you know whether your brother has</li> </ul>	10 11 12 13 14	A. Q. A. Q. A. Q.	How do you know where to go? Because I know how to get there. What's it next to? Excuse me? What's it close to?	
10 11 12 13 14	<ul> <li>A. I can't answer for him. You would have to ask him.</li> <li>Q. Why does he buy your scrap?</li> <li>A. You'd have to ask him.</li> <li>Q. Do you know whether your brother has a business?</li> </ul>	10 11 12 13 14 15	A. Q. A. Q. A. Q. A.	How do you know where to go? Because I know how to get there. What's it next to? Excuse me? What's it close to? A neighborhood.	
10 11 12 13 14 15	<ul> <li>A. I can't answer for him. You would have to ask him.</li> <li>Q. Why does he buy your scrap?</li> <li>A. You'd have to ask him.</li> <li>Q. Do you know whether your brother has a business?</li> <li>A. I don't know.</li> </ul>	10 11 12 13 14 15	A. Q. A. Q. A. Q. A. Q.	How do you know where to go? Because I know how to get there. What's it next to? Excuse me? What's it close to? A neighborhood. What neighborhood?	
10 11 12 13 14 15	<ul> <li>A. I can't answer for him. You would have to ask him.</li> <li>Q. Why does he buy your scrap?</li> <li>A. You'd have to ask him.</li> <li>Q. Do you know whether your brother has a business?</li> <li>A. I don't know.</li> <li>Q. What's your brother's name?</li> </ul>	10 11 12 13 14 15 16	A. Q. A. Q. A. Q. A. Q. A.	How do you know where to go? Because I know how to get there. What's it next to? Excuse me? What's it close to? A neighborhood. What neighborhood? I don't know.	
10 11 12 13 14 15 16 17	A. I can't answer for him. You would have to ask him.  Q. Why does he buy your scrap?  A. You'd have to ask him.  Q. Do you know whether your brother has a business?  A. I don't know.  Q. What's your brother's name?  A. Pete.	10 11 12 13 14 15 16 17 18	A. Q. A. Q. A. Q. A. Q. A. Q. A. Q.	How do you know where to go? Because I know how to get there. What's it next to? Excuse me? What's it close to? A neighborhood. What neighborhood? I don't know. What's his name?	
10 11 12 13 14 15 16 17 18	A. I can't answer for him. You would have to ask him.  Q. Why does he buy your scrap?  A. You'd have to ask him.  Q. Do you know whether your brother has a business?  A. I don't know.  Q. What's your brother's name?  A. Pete.  Q. What's his last name?	10 11 12 13 14 15 16 17 18	A. Q. A. Q. A. Q. A. Q. A. Q. A.	How do you know where to go? Because I know how to get there. What's it next to? Excuse me? What's it close to? A neighborhood. What neighborhood? I don't know. What's his name? Same as mine.	
10 11 12 13 14 15 16 17 18	A. I can't answer for him. You would have to ask him.  Q. Why does he buy your scrap?  A. You'd have to ask him.  Q. Do you know whether your brother has a business?  A. I don't know.  Q. What's your brother's name?  A. Pete.  Q. What's his last name?  A. Riley.	10 11 12 13 14 15 16 17 18 19 20	A. Q. A. Q. A. Q. A. Q. A. Q. A. Q. A.	How do you know where to go? Because I know how to get there. What's it next to? Excuse me? What's it close to? A neighborhood. What neighborhood? I don't know. What's his name? Same as mine. Is he a junior?	
10 11 12 13 14 15 16 17 18 19 20	A. I can't answer for him. You would have to ask him.  Q. Why does he buy your scrap?  A. You'd have to ask him.  Q. Do you know whether your brother has a business?  A. I don't know.  Q. What's your brother's name?  A. Pete.  Q. What's his last name?  A. Riley.  Q. Where does he live?	10 11 12 13 14 15 16 17 18 19 20 21	A. Q. A. Q. A. Q. A. Q. A. Q. A.	How do you know where to go? Because I know how to get there. What's it next to? Excuse me? What's it close to? A neighborhood. What neighborhood? I don't know. What's his name? Same as mine. Is he a junior? Yes.	
10 11 12 13 14 15 16 17 18 19 20 21	A. I can't answer for him. You would have to ask him. Q. Why does he buy your scrap? A. You'd have to ask him. Q. Do you know whether your brother has a business? A. I don't know. Q. What's your brother's name? A. Pete. Q. What's his last name? A. Riley. Q. Where does he live? A. Barton.	10 11 12 13 14 15 16 17 18 19 20 21	A. Q. Q. A. A. Q. A. Q. A. Q. A. A. Q. A. Q. A. Q. A. Q. A. Q. A. Q. A. A. A. Q. A. A. A. Q. A. A. A. Q. A.	How do you know where to go? Because I know how to get there. What's it next to? Excuse me? What's it close to? A neighborhood. What neighborhood? I don't know. What's his name? Same as mine. Is he a junior? Yes. Is he married?	
10 11 12 13 14 15 16 17 18 19 20 21 22 23	A. I can't answer for him. You would have to ask him.  Q. Why does he buy your scrap?  A. You'd have to ask him.  Q. Do you know whether your brother has a business?  A. I don't know.  Q. What's your brother's name?  A. Pete.  Q. What's his last name?  A. Riley.  Q. Where does he live?  A. Barton.  Q. Where at in Barton?	10 11 12 13 14 15 16 17 18 19 20 21 22 23	A. Q. A.	How do you know where to go? Because I know how to get there. What's it next to? Excuse me? What's it close to? A neighborhood. What neighborhood? I don't know. What's his name? Same as mine. Is he a junior? Yes. Is he married? Yes.	
10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25	A. I can't answer for him. You would have to ask him. Q. Why does he buy your scrap? A. You'd have to ask him. Q. Do you know whether your brother has a business? A. I don't know. Q. What's your brother's name? A. Pete. Q. What's his last name? A. Riley. Q. Where does he live? A. Barton.	10 11 12 13 14 15 16 17 18 19 20 21	A. Q. Q. A. A. Q. A. Q. A. Q. A. A. Q. A. Q. A. Q. A. Q. A. Q. A. Q. A. A. A. Q. A. A. A. Q. A. A. A. Q. A.	How do you know where to go? Because I know how to get there. What's it next to? Excuse me? What's it close to? A neighborhood. What neighborhood? I don't know. What's his name? Same as mine. Is he a junior? Yes. Is he married?	

GE(	ORGE MICHAEL RILEY, SR.	`	November 4, 2013
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1	Q. Can you spell it?	1	your utilities? Where do you go?
2	A. No.	2	A. Just give them cash.
	Q. Do they have any children?	3	Q. Who?
3	A. Yes.	4	A. You can go to Kroger's and pay the
4		5	electric bill.
5	· ·	6	Q. Is that where you pay your electric
6		7	bill?
7			A. I don't remember.
8	A. Kenley.	8	
9	Q. Where does your son work?	9	
10	A. I don't know.	10	sir?
11	Q. You don't know where your son works?	11	A. I don't remember.
12	A. Uh-uh.	12	Q. Where do you pay your gas bill?
13	Q. Does he have a job?	13	A. I don't remember.
14	A. Yeah.	14	Q. What do you use to pay the gas that
15	Q. What's he do?	15	you put in the vehicles that you borrow?
16	A. He's an engineer.	16	A. Cash.
17	Q. You don't know the name of the	17	Q. You don't have a credit card for any
18	company?	18	gas station services?
19	A. I don't.	19	A. No.
20	MR. BECKER: Forgot one.	20	Q. Have you ever done any work for Jerry
21	(Plaintiff's Exhibit Number 23 was	21	McClain in Newark, M C capital C L A I N?
22	marked for identification.)	22	A. I don't remember.
23	Q. Marked as Plaintiff's Exhibit 23, the	23	Q. Do you have any business in the
24	Florida Division of Corporations listing for	24	future that you are supposed to do for Jerry
25	Jamaican Lake Owners Association, Inc., which	25	McClain?
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1	we discussed earlier in the day, it lists you,	1	A. I don't know what you are talking
ł	George Riley, as one of the individuals	2	about.
2	involved in that entity. Do you see that?	3	Q. Well, have you and Mr. McClain
3	A. I do not.	4	discussed you doing work for him?
4		5	A. I don't know what you are talking
5	Q. Your name is at the bottom, sir.		about.
6	A. Again, there's people that has the	6	Q. Do you know Jerry McClain?
7	same name as mine that lives all over the	7	A. I heard the name before.
8	country.	8	and the second s
9	Q. So your position is you have no	9	Q. So have you had any discussions with Mr. McClain?
10	relationship and no interest and have never	10	_
11	heard of that company?	11	
12	A. I don't know.	12	Q. What work are you going to do for
13	Q. Either you know	13	Mr. McClain?
14	A. I don't remember.	14	A. Didn't know that I was.
15	Q. So you don't deny it, then.	15	Q. Well, you just told me you didn't
16	Currently have any credit cards?	16	know if you were, so either you know or you
17	A. I do not.	17	A. I said I heard the name.
18	Q. Do you have any debit cards?	18	Q don't know.
19	A. I do not.	19	A. I heard the name before.
20	Q. How do you pay your utilities, heat,	20	Q. Have you ever had any discussions
21	water?	21	with the man?
22	A. Cash.	22	A. In regards to?
23	Q. At which location?	23	Q. Anything.
24	A. What do you mean, at what location?	24	A. I don't remember.
25	Q. Where do you go to pay with cash for	25	Q. Are you scheduled to do any work for
1			

GI	EORGE MICHAEL RILLY, SR.		November 4, 2015
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1	Mr. McClain?	1	Q. Do you have any document to support
2		2	that you owe this debt?
3	0 11 1 1 1 1 1 1	3	A. Do I?
4		4	Q. Yes, sir.
5		5	A. Maybe a little bit more. I don't
6		6	know. What do you mean the document to
7	x 1 1, 1	7	support?
8	O 777 11 11 1 1 1 1 1 1 1 1 1 1 1 1 1 1	8	Q. Do you have any documents that
9	1 0	9	indicate that you owe this Roger Berrick
10		10	\$569,000?
11		11	A. I don't know where they are. It's
12		12	been a while.
13		13	Q. How long ago?
14		14	A. A long time.
15		15	Q. A year, two years?
16	Q. On page six of that document, you	16	A. A long time.
17	list a debt of \$96,000 for an equipment repair	17	Q. What did you do with the documents?
18	*****	18	A. I don't know.
19	construction company is that?	19	Q. When is the last time you saw any of
20	A. I believe it's on there.	20	the crushers that this gentleman supposedly did
21	. Q. Well, the word that is on here is G U	21	work for you on?
22	TKNECHT.	22	A. It's been a long time.
23	A. Yeah. Gutknecht Construction.	23	Q. Weeks, months, years?
24	Q. Where are they?	24	A. I don't know. I don't remember.
25	A. Bellaire, Ohio.	25	Q. When is the last time you talked to
	D 400		Page 104
	Page 102		Page 104
1	. Q. Where?	1	Roger Berrick?
2	A. Bellaire, Ohio.	2	A. I don't know.
3	Q. Why did you list this debt on your	3	Q. Why didn't you list that debt on your
4	<u> </u>	4	bankruptcy filing?
5		5	MR. GUNNER: He did an amendment to
6	Q. What is it for?	6	that.
7	•	7	Q. Sir?
8	1	8	A. Excuse me?
9		9	Q. Why didn't you want to list that on
10	`	10	your bankruptcy filing?
11		11	A. Why did I what?
12		12	Q. Why did you not list the debt that
13	· · · · · · · · · · · · · · · · · · ·	13	you listed on your domestic relations filing on
14	· · · · · · · · · · · · · · · · · · ·	14	your bankruptcy filing?
15	· · · · · ·	15	A. I don't know.
16		16	Q. So on your domestic relations filing
17		17	you list as a closely held stock and other
18	· · · · · · · · · · · · · · · · · · ·	18	business interest Michael Riley, sole proprietorship. What is that?
19	• • •	19 20	A. I have no idea what you are saying.
20	· · · · · · · · · · · · · · · · · · ·	21	Q. Well, look at Exhibit 13, sir. It's
21		21	in front of you there.
22		23	A. Where at?
23	4	24	Q. It looks like the fourth page from
25		25	the end of the document.

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EORGE MICHAEL RILEY, SR.		November 4, 20
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1 (Mr. Danford stepped out of the	1	I, GEORGE MICHAEL RILEY, SR., do
2 deposition room.)	2	hereby certify that the foregoing is a true and
3 A. Is this it?	3	accurate transcription of my testimony.
4 Q. This one. Fourth page from the end.	4	
A 01	5	
<ul><li>A. Okay.</li><li>Q. You have listed underneath the</li></ul>	6	
	7	
	8	
	9	GEORGE MICHAEL RILEY, SR.
9 Michael I'm sorry Mike Riley, sole	10	
<ul><li>proprietorship. What is that?</li><li>A. I don't know. You have to ask that</li></ul>	11	DATE
	12	
2 attorney.	13	
3 Q. That is not anything that's listed on	14	
4 your bankruptcy filing, correct?	15	
5 A. I don't know. I'm not an attorney.		
6 MR. BECKER: I think we're about	16	
7 done. Two seconds. Off the record.	17	
8 (An off-the-record discussion was held.)	18	
9 MR. BECKER: I don't have any other	19	
o questions for you today, sir. We will reserve	20	
our right to address the court as to whether or	21	
2 not the answers that you've provided to us in	22	
3 this deposition have been sufficient or whether	23	
we need to revisit this on another day.	24	
5 THE WITNESS: Can we state for the	25	
Page 106		Page 10
Page 106		
1 record who all was present in this deposition?	1	STATE OF OHIO )  COUNTY OF GREENE ) SS: CERTIFICATE
MR. GUNNER: She's got that down, I'm	2	,
3 sure. You have a right to read, if he orders	3	I, Melissa A. Neary, a Notary Public
4 this transcribed, typed up, or you can waive	4	within and for the State of Ohio, duly
5 the right to read it. You can't change your	5	commissioned and qualified,
6 answers, but you can correct any typos or	6	DO HEREBY CERTIFY that the above-named
7 misspellings or something the court reporter	7	GEORGE MICHAEL RILEY, SR., was by me first duly
8 does. So you need to indicate to her whether	8	sworn to testify the truth, the whole truth,
9 you want to read it or waive your right to read	9	and nothing but the truth; that said testimony
o it.	10	was reduced to writing by me stenographically
THE WITNESS: Okay. I want to read	11	in the presence of the witness and thereafter
2 it.	12	reduced to typewriting.
3 (The deposition was concluded at 4:03 p.m.)	13	I FURTHER CERTIFY that I am not a
4	14	relative or Attorney of either party nor in any
- 5 * * *	15	manner interested in the event of this action.
6	16	IN WITNESS THEREOF, I have hereunto
7	17	set my hand and seal of office at Xenia, Ohio,
8	18	on this 19th day of October, 2013.
9	19	-
•	20	/s/ Melissa A. Neary
0		MELISSA A. NEARY
0	27	
1	21	NOTARY PUBLIC, STATE OF OHIO
1 2	22	
1 2 3	22 23	NOTARY PUBLIC, STATE OF OHIO
1 2	22	NOTARY PUBLIC, STATE OF OHIO

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